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Significant adjustments made
<ul style="list-style-type: none"> • June 2019 Stage 2 amended to be completed at Director level and Stage 3 at Board level • June 2019 Sections 6&7 reflecting new Visitor Services role in handling

Customer Complaints Policy

1. Introduction

Alexandra Park and Palace Charitable Trust (APPCT) and its trading subsidiary APTL, hereafter known as 'Alexandra Palace', view complaints as an opportunity to explain our actions, to put things right for the person or organisation that has made the complaint, if appropriate, and as an opportunity to learn and improve what we do and how we do it.

2. Scope

This policy covers complaints about Alexandra Palace's provision of services and public benefit. The scope of the policy does not include internal complaints or grievances, or complaints of a whistleblowing nature, which are dealt with under separate policies. Employee complaints should be dealt with under the Grievance or Whistleblowing Policies.

3. Policy

- 3.1 A complaint is any expression of serious dissatisfaction, whether justified or not, about any aspect of Alexandra Palace. For this reason, the complaints policy applies both to the Trust and its Trading Subsidiary.
- 3.2 Alexandra Palace outsource some delivery to contractors, if the complaint is about or involves a contractor this is considered to be a complaint about Alexandra Palace.
- 3.3 Alexandra Palace organises hires of the Park and the Palace to external clients for events and activities. In this instance customers of those events are customers of the external client and complaints will be forwarded to them, as appropriate, for resolution.
- 3.4 We aim to:
 - provide a fair complaints procedure which is clear and easy to use
 - publish the complaints procedure so that people know how to make a complaint
 - respond to all complaints in a timely manner and investigate them appropriately and fairly
 - resolve complaints and repair relationships, wherever possible
 - gather information and take action when necessary to help us to improve
 - to handle all complaints and complaint information sensitively, telling only those who need to know, following principles of relevant data protection legislation
 - ensure everyone at Alexandra Palace knows what to do if a complaint is received.

4. Complaints handling

- 4.1 It is recognised that complaints may arrive through channels publicised for that purpose or through any other contact details or opportunities the complainant may have. Once recognised as a complaint, all complaints will be handled according to this policy and will be treated confidentially.
- 4.2 We will;
- acknowledge complaints within five working days
 - tell the complainant what will happen next and give an indication of timescale
 - make the complainant aware of our complaints policy
- 4.3 For complaints received by telephone or in person, the person receiving the complaint will aim to capture and record the information outlined above. When appropriate, we will ask the complainant to send a written account by post or by email so that the complaint is recorded in the complainant's own words.

5. Making a Complaint

- 5.1 We encourage the swift reporting of dissatisfaction, whilst on site, to the staff at the facility being used or at one of the designated receptions so that we have the opportunity to put things right at the time.
- 5.2 If this is not possible, or you are not satisfied with the response received:
- in writing to 'Feedback' at Alexandra Park & Palace Charitable Trust, Alexandra Palace Way, Wood Green, London N22 7AY
- or by e-mail to Customer.Service@alexandrapalace.com
- or by telephone 020 8365 2121
- 5.3 When you make a complaint it is helpful if you could include the following information,
- Describe clearly what happened, (Include the date, time and location of the incident. Please be as specific as possible about the location within the Palace or the Parkland)
 - Tell us why you are making a complaint
 - Tell us what you would like us to do
 - Please provide your full name, email address and contact phone number
 - Tell us how you would prefer us to contact you
 - If appropriate, please send us any documents that support your complaint.
- 5.4 We cannot guarantee that complaints made via social media will be seen and responded to within the timescales set out in this policy. We do not have the resources to monitor the wide range of social media channels available. We will aim to acknowledge complaints made via these channels but refer the complainant to an alternative method of communication so that the complaints policy can be followed.
- 5.5 If you have asked someone to contact us on your behalf, please make sure they provide evidence of their authority to act on your behalf.
- 5.6 If you wish to make a complaint anonymously please be assured that we will look into it, but our ability to address it fully will be limited. We would encourage you to consider our Whistleblowing Policy as a more appropriate way to make your complaint and protect your identity.
- 5.7 We would encourage a complainant to contact us directly with their complaint. However, a complaint can be made to the Charity Commission at any stage. Information about the kind of

complaints the Commission can involve itself in can be found on their website at:
www.charitycommission.gov.uk/publications/cc47.aspx

5.7 Alexandra Palace is registered with The Fundraising Regulator and we abide by standards set out in the Code of Fundraising Practice. Complaints in relation to our fundraising activities will be dealt with in accordance with this complaints policy. However a complaint can be made to the Fundraising Regulator if you are not satisfied with the outcome of our complaints procedure <https://www.fundraisingregulator.org.uk/>

6. Resolving Complaints

6.1 Alexandra Palace recognises that some complaints will be made directly to individual staff members or departments for resolution. In many cases, a complaint is best resolved by the person responsible for the issue being complained about. If the complaint has been received directly to an individual they will assess if they are able to resolve it swiftly, and should do so if possible and appropriate. This is our opportunity to apologise, explain and rectify if we can.

6.2 If the individual cannot resolve the complaint or the issue is regarded to be sensitive or significant, the complaint information should be recorded and passed to the Head of Department as soon as possible.

6.3 The person who receives a complaint should capture:

- the facts of the complaint including date and time
- Take the complainant's name, address and telephone number
- Note down the relationship of the complainant to Alexandra Palace
- Tell the complainant that we have a complaints procedure and where to find it
- Tell the complainant what will happen next and how long it will take
- Where appropriate, ask the complainant to send a written account by post or by email so that the complaint is recorded in the complainant's own words.

6.4 The Head of Department will assess:

- If the complaint can be handled at department level or whether it needs to enter the formal complaints procedure, below
- If the complaint is a recurring complaint that needs to be escalated to a Director to identify and implement actions to prevent future complaints
- What further evidence may be available to assess the complaint e.g. CCTV evidence, security logs, event incident logs. In the case of CCTV, will inform security to save the recording for the appropriate timings.

6.5 Complaints received via the 'feedback' route will be logged by Visitor Service Assistants (VSA) who are responsible for responding to low level complaints within 72 hours. If the complaint cannot be resolved within 72 hours a response acknowledging this will be sent by the VSA with a deadline for response (within the 4 week period).

6.6 If a VSA is unable to handle the enquiry it will be escalated to the Visitor Service Supervisor and serious matters will be referred to the Visitor Service Manager who will liaise with the relevant heads of departments to gather a response. The response to the customer will be sent by the Visitor Service Manager.

6.7 The Visitor Service Manager will address:

- If the complaint can be handled at department level or whether it needs to enter the formal complaints procedure, below
- If the complaint is a recurring complaint that needs to be escalated to a Director to identify and implement actions to prevent future complaints
- What further evidence may be available to assess the complaint e.g. CCTV evidence, security logs, event incident logs. In the case of CCTV, will inform security to save the recording for the appropriate timings.

- 6.8 Anonymous complaints should be logged as such and treated in as similar way as possible. If at all possible the complainant should be encouraged to consider the Whistleblowing Policy as a way to make their point whilst protecting their identity.
- 6.8 If an individual is concerned he/she can inform the Whistle blowing contact by telephone: 020 8365 4555 or by emailing whistleblowing@alexandrapalace.com please see whistleblowing policy for further details.

7. Formal complaints procedure

7.1.1 Stage One - Process

On receiving the complaint into the formal procedure, internally or via the 'feedback' route, it is recorded in the complaints log by a complaints administrator or by the Head of Department. The complaints administrators are,

- Visitor Service Assistants
- Visitor Service Supervisor
- Visitor service Manager
- CEO Executive Assistant

The CEO will call a Complaint Panel to assess the complaint, the issues it raises and to resolve and respond to the complainant; or determine whether the complaint warrants an 'internal investigation'. If an internal investigation is called for, the CEO will appoint an appropriately independent and senior member of staff to investigate.

The panel will agree the scope, method and timescale for the investigation. The investigation procedure will be tailored to each complaint but follow the principles outlined in appendix 1.

7.1.2 Stage One - Outcomes

The outcome of stage 1 will be a response to the complaint to explain our actions or the situation and whether we agree with their complaint and what we are doing about it; or the outcome of the investigation.

There are three outcomes of an investigation:

- a) complaint upheld - the complaint is justified in full or in part and the organisation needs to take remedial action
- b) complaint not upheld – the organisation acted in accordance with its standard operating policies and procedures and that these are in accordance with legal requirement and industry best practice.
- c) complaint not upheld – as b) but there are lessons for the organisation.

7.1.3 Stage One - Communication

Ideally complainants should receive a definitive reply within four weeks. If this is not possible because, for example, an investigation has not been fully completed, a progress report should be sent with an indication of when a full reply will be given.

Whether the complaint is justified or not, the reply to the complainant should describe the action taken to assess or investigate the complaint, the conclusions from the investigation, and any action taken as a result of the complaint.

If the complaint relates to a specific member of staff or volunteer, they will be informed and given a fair opportunity to respond. Complaints will be acknowledged within five working days. The acknowledgement should say who is dealing with the complaint and when the person complaining can expect a reply.

A copy of this complaints procedure should be attached.

7.2.1 *Stage Two - Process*

If the complainant feels that the problem has not been satisfactorily resolved at Stage One, they can request that the complaint is reviewed at Director level. At this stage, the complaint will be passed to the CEO of Alexandra Park & Palace.. The CEO may undertake the review themselves or delegate to another Director of Alexandra Palace.

The scope of stage two is to establish if the,

- process was undertaken in accordance with the complaints policy
- process was appropriately thorough
- evidence supported the conclusions reached

This may involve reviewing the paperwork and speaking with the individuals who dealt with the complaint at level one. No new evidence should be submitted at this stage.

7.2.2 *Stage two – Outcomes*

There are three outcomes of a review

- a) The investigation conclusion – was not justified in full or in part and the organisation needs to take remedial action
- b) The investigation conclusion - was justified and the complaint remains 'not upheld'.
- c) The investigation conclusion – was justified but there are lessons for the organisation

7.2.3 *Stage Two Communication*

The request for a Director level review should be acknowledged within five working days of receipt. The acknowledgement should say who will deal with the case and when the complainant can expect a reply.

7.3 *All stages*

If the complaint relates to a specific member of staff or contractor, they should be informed and given a further opportunity to respond. The person who dealt with the original complaint at Stage One should be kept informed of what is happening.

7.4 Ideally complainants should receive a definitive reply within four weeks. If this is not possible because for example, an investigation has not been fully completed, a progress report should be sent with an indication of when a full reply will be provided.

7.5 Whether the complaint is upheld or not, the reply to the complainant should describe the action taken to investigate the complaint, the conclusions from the investigation, and any action taken as a result of the complaint.

7.6.1 *Stage Three - Process*

If the complainant feels that the problem has not been satisfactorily resolved at Stage Two, they can request that the complaint is reviewed at Board level. At this stage, the complaint will be passed to the Chair of the Alexandra Park & Palace Charitable Trustee Board. The Chair may undertake the review themselves or delegate to another board member of Alexandra Palace.

The aim of stage three is to review the process followed at stage two, and may involve reviewing paperwork and speaking with individuals involved at stages one and two.

No new evidence should be submitted at this stage.

7.6.2 *The outcomes of stage three*

There are three outcomes of a review

- a) The stage 2 investigation conclusion is upheld and no further action is required
- d) The stage 2 investigation conclusion – is overturned
- e) The investigation conclusion – was justified but there are lessons for the organisation

7.6.3 *Stage Three Communication*

The request for Board level review should follow the same procedure and timescales as at stage two

The decision taken at this stage is final, unless the Board decides it is appropriate to seek external assistance with resolution.

8. Variation of the Complaints Procedure

The organisation may vary the procedure for good reason. This may be necessary to avoid a conflict of interest, for example, a complaint about a Director should not also have the Director as the person leading a Stage Two review.

In the case of multiple complaints from beneficiaries about the same issue (customers, visitors, users of the Park and Palace) the complaint will be assessed as a single complaint but each individual complainant will be responded to.

9. Recording, Monitoring and Learning from Complaints

Complaints are recorded on entering the official complaints procedure and the recorded information detailed above is allocated a complaint reference number. For further details on information recorded and held see appendix 2.

Complaints are reviewed annually to identify any trends that may indicate a need to take further action.

10. Responsibility

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

11. Appendices

Appendix 1 – Internal Complaints Investigations
Appendix 2 – Complaint Recording

12. Associated documentation and further information

Data Protection and Document Retention Policies
Subject Access Request Policy
Whistleblowing Policy

13. Status of policy

This procedure is a statement of current Alexandra Palace policy taking into account current legislation. Alexandra Palace therefore reserves the right to amend the procedure as necessary to meet any changing requirements.

The organisation will review and ensure compliance with this policy at regular intervals.

Date	Version	Author	Amendments
June 2019	V4	Commercial Director & VSM	Includes the role of the Visitor Service Team in complaint/feedback handling included. Sections 6 & 7 Stage 2 amended to be completed at Director level and Stage 3 at Board level

14. Data protection

Alexandra Palace processes personal data as part of recording and responding to complaints in accordance with its data protection policy. The organisation has in place arrangements to ensure that personal data is held securely and accessed by, and disclosed to, authorised individuals only. Inappropriate access or disclosure of personal data constitutes a data breach and should be reported in accordance with the organisation's data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under the organisation's disciplinary procedure

15. Equality

Alexandra Palace is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, sex, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy and maternity, religion or belief, responsibilities for dependents, age, physical/mental disability or offending background.

APPENDICES

Appendix 1 - Internal Complaints Investigations

An investigation may be necessary because it involves accusations of discrimination, personal injury, inappropriate staff members conduct, the involvement or interest of the media or police involvement.

An investigation may be called if it is assessed that the complaint could escalate if not given this level of treatment at this stage.

The purpose of an internal investigation is to;

- establish facts and evidence and other relevant information about an incident or complaint from the organisation's perspective,
- to identify what remedial action or improvements, if any, need to be made

An investigation will be led by a suitably experienced individual, who is or was not directly involved in the issue being investigated and is not in a position of direct line management of an individual being complained about or providing witness statement.

The investigation lead will agree with the CEO

- the scope of the investigation
- the key questions that need to be answered
- how to collect, document and file information
- how information should be reported
- the timescale for completion

The investigation lead will have authority to call for CCTV evidence, request witness statements and/or the meeting attendance of employees and employees of third party contractors, as appropriate.

Appendix 2 – Complaint recording

Complaint record keeping

A complaint register is held by the organisation. All acknowledged complaints will be recorded on the complaints register. The Executive Assistant to the CEO holds the complaints register which does not store personal data once the issue has been resolved and responded to.

The complaint register records:

- the complaint reference number
- The date the complaint was made
- The name of the complainant, while the complaint is live (anonymised once complaint resolved)
- The nature of the complaint
- The name of the lead investigator/complaint handler
- What action is or has been taken
- The date of action being taken
- The outcome of the complaint
- If the complaint corresponds with an incident logged by the onsite security team (on the 'Incident or Issue log' known as the IOI) the relevant reference number will also be recorded.

Complaint file (Paper and electronic)

A complaint file will be opened for each complaint and will include,

- A copy of the complaint - such as the letter, email, or recorded information from social media or complaint phone call
- All correspondence in relation to the complaint, including written communication within the organisation
- A copy of the investigation report and supporting evidence.

Investigation reports

All internal investigations will produce an investigation report in the agreed organisational format. This report will include;

- The nature, process, and findings of the investigation and its conclusion.
- The witness statements and supporting evidence.
- Any points of learning for the organisation and any action required

Complaint document retention

The complaint register information will be held on a restricted access file for a maximum of five years so that trend data can be established for performance management purposes.

This complaint file will be held on a restricted access file for a maximum of three years or until the complaint is fully resolved. Full resolution includes any subsequent action being taken by the complainant or any third party such as the charity regulator, ombudsman, Health and Safety Executive (HSE) or UK Courts.

After these stated time periods the documentation will be deleted and/or destroyed

Complainant access to stored information

If a complainant requests access to their personal data through a formal Subject Access Request (SAR) under the Data Protection Act (DPA) the information will be provided in accordance with the requirements of the legislation and guidance from the regulator, the Information Commissioners Office (ICO).

However, information will be anonymised and redacted as deemed necessary to protect and safeguard employees, and the employees of third party contractors, of Alexandra Palace.

The Charity and its trading subsidiary are not public bodies and therefore not subject to Freedom of Information (FOI) legislation. If information is requested the Chief Executive will consider each request on its own merit, assessing whether it is in the best interests of the Charity to release any information and the terms on which the information will be provided.

