



## 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

- 2.1 This policy aims to ensure that visitor and customer complaints are managed consistently and appropriately.
- 2.2 Alexandra Palace outsources some delivery to contractors and hires the Park and the Palace to external clients for events and activities. Any customer complaint about a contractor, client or event is included within the scope of this policy.
- 2.3 Employee complaints or grievances are not included within the scope of this policy and are dealt with under separate Grievance and 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 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;
  - 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. Making a Complaint

4.1 We encourage the swift reporting of dissatisfaction, whilst a customer is on site, to the staff at the facility being used or at one of the designated receptions so that we can put things right at the time.

4.2 If this is not possible, or customers are not satisfied with the response received, complaints should be made:

**in writing** to 'Feedback' at Alexandra Park & Palace Charitable Trust,  
Alexandra Palace Way, Wood Green, London N22 7AY

**by e-mail** to [Visitor.Services@alexandrapalace.com](mailto:Visitor.Services@alexandrapalace.com)

**by telephone** on 020 8365 2121

4.3 Your complaint should include the following information:

- A clear description of what happened, including 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 as an outcome.
- Please provide your full name, email (or postal) 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.

4.4 Complaints received by members of staff in other departments:

- the person receiving the complaint will aim to capture and record the information outlined above and will pass the complaint to the Visitor Services Team for handling.
- When appropriate, we will ask the complainant to send a written account by post or by email to the Visitor Services Team so that the complaint is recorded in the complainant's own words.

4.5 Complaints made via social media:

- We cannot guarantee that complaints made by social media channels will be seen and responded to within the timescales set out in this policy as 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.

4.6 If you have asked someone to contact us on your behalf, please make sure they provide evidence that you have given them permission to act on your behalf.

4.7 Anonymous complaints will be treated in as similar a way as possible, although the complainant should be encouraged to consider the Whistleblowing Policy as a more appropriate way complain and protect their identity.

- 4.8 If an individual is concerned they can inform the Whistle blowing contact by telephone: 020 8365 4555 or by emailing [whistleblowing@alexandrapalace.com](mailto:whistleblowing@alexandrapalace.com) please see whistleblowing policy for further details.
- 4.9 We encourage customers and visitors 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](http://www.charitycommission.gov.uk/publications/cc47.aspx)
- 4.10 Alexandra Palace is registered with The Fundraising Regulator and adopts the 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/>

## 5. Complaints handling

- 5.1 To ensure they are appropriately recorded and handled; all complaints are to go through the Visitor Services Team.
- 5.2 A Visitor Services Assistant (VSA) will:
- log all complaints;
  - respond to low level complaints within 72 hours;
  - tell the complainant what will happen next and give an indication of timescale;
  - make the complainant aware of this complaints policy.
- 5.3 If a complaint cannot be resolved within 72 hours a response acknowledging this will be sent by the VSA with a deadline for response (within a 4-week period).
- 5.4 Stage 1
- 5.4.1 If the complainant is not satisfied with the VSA's handling of the complaint, the complaint will be escalated to the Visitor Services Supervisor and if the complaint is still not resolved it will be escalated to the Visitor Services Manager/ Assistant Visitor Services Manager and subsequently the Head of Visitor Services.
- 5.4.2 The Head of Visitor Services will conclude or escalate the complaint.

## 5.5 Stage 2

Where complaints are recurring or particularly sensitive, the Head of Visitor Services may assess whether the issue warrants escalation to Executive Leadership Team members to identify and implement actions to prevent future complaints.

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.

## 5.6 Stage 3

Where a complaint is recurring, the Head of Visitor Services may escalate it to the Chief Executive or an Alexandra Palace Board Member.

At this stage, the complaint will be passed to the CEO or 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.

## 6. **Complaint Resolution**

6.1 Complaint responses will 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.

6.2 The Head of Visitor Services may request an investigation into a complaint which will provide one of the following conclusions:

- a) Complaint is 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 in b) above, but there are lessons for the organisation.
- d) Complaint partially upheld and explanation provided as in a) b) and c) above.

6.3 Ideally complainants should receive a definitive reply within four weeks. If this is not possible an indication will be given of when a full reply can be expected.

6.4 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.

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

## 7. **Variation of the Complaints Procedure**

7.1 The Head of Visitor Services may vary the procedure for good reason. This may be necessary to avoid a conflict of interest, for example.

7.2 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.

## 8. Recording, Monitoring and Learning from Complaints

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

## 9. Responsibility

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

## 10. Associated documentation and further information

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

## 11. Data Protection

Alexandra Palace processes personal data as part of recording and responding to complaints in accordance with its data protection policy. When an individual makes a complaint, Alexandra Palace will process any personal data collected in accordance with our data protection policy. Data collected is held securely and accessed by, and disclosed to, individuals only for the purpose of dealing with the complaint.

## 12. 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.

## 13. Status of policy

This 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.

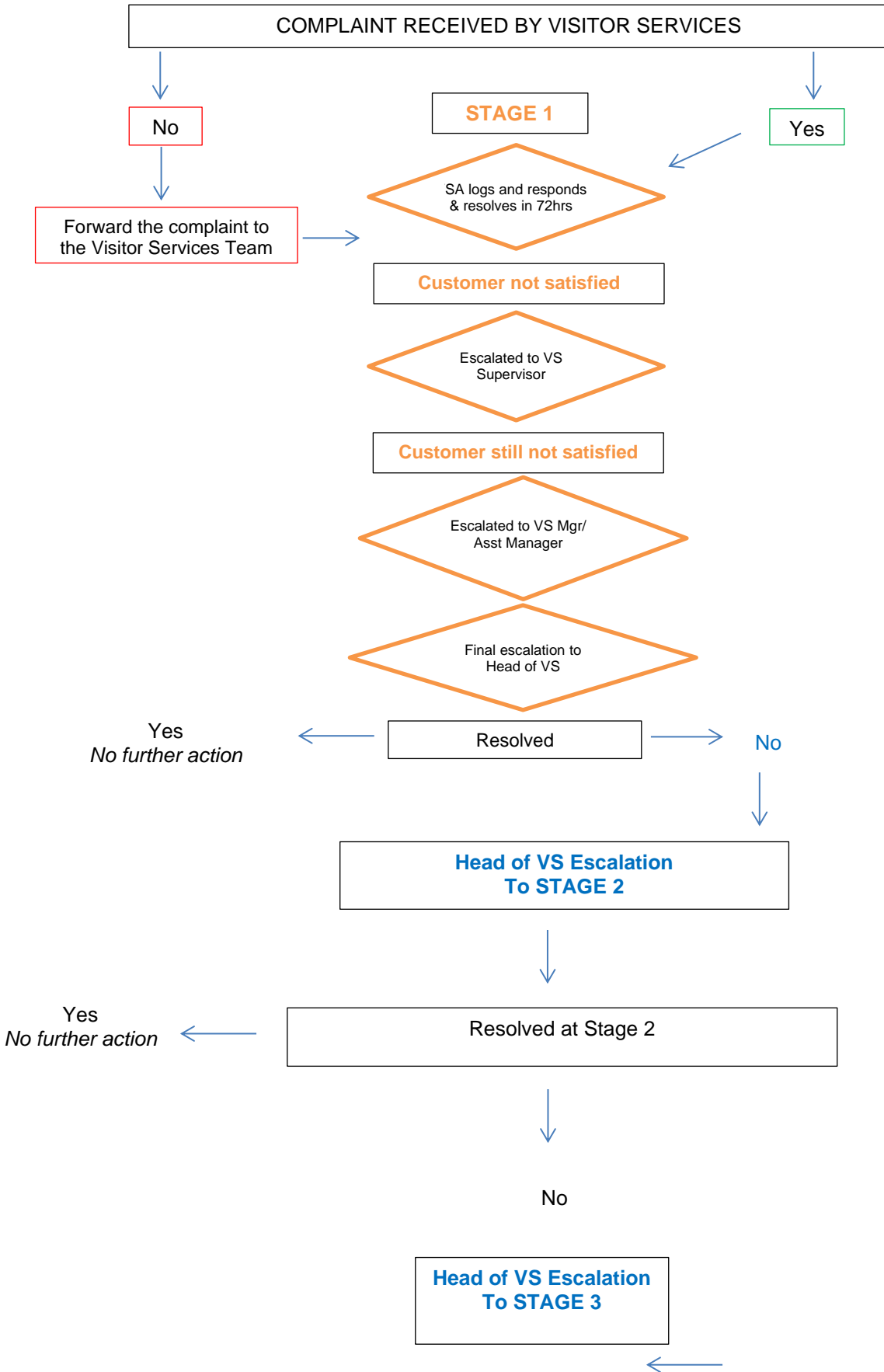
The organisation will review and ensure compliance with this policy at regular intervals.

POLICY REVIEW		
Date	Author	Amendments
June 2019	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
July 2022	Head of VS	Simplified for a clear and consistent process, emphasis on all complaints going via the Visitor Services Team.

## 14. Appendices

Appendix 1 – Internal Complaints Procedure Flowchart  
Appendix 2 – Complaint Recording

# Appendix 1 - Internal Complaints Procedure Flowchart



## Appendix 2 – Complaint recording

### Complaint record keeping

All acknowledged complaints will be recorded on the complaints register.

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 filing (Paper and electronic)

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

- ~~A copyCopies of the complaint -- such as the\_ letters, emails, or recorded information from social media or complaint phone call and related correspondence and will be filed in a digital complaints folder as well as any investigation reports and supporting evidence.~~
- ~~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.