


Complaints Policy & Procedure for Prize Led Fundraising (Weekly Lottery, Raffle) Policy and SOP



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Policy

1 Purpose and Objectives

The purpose and objective of this policy and procedure is to set out how we will manage any complaint we receive in relation to our lottery, raffle or prize-led fundraising activity, whether directly to us, to a volunteer, a third-party acting on our behalf, or to a regulator.

2 Scope

We define a complaint as an expression of dissatisfaction made to us by any means, about any aspect of the way we conduct the activities for which we hold a Gambling Commission licence. For example, a complaint:

- about the outcome of a lottery, raffle or other prize led fundraising activity
- about the way a lottery, raffle or other prize led fundraising activity has been managed
- that concerns the way we carry out our business in relation to the LCCP's three licensing objectives, which are:
 - The protection of children and the vulnerable,
 - Keep crime out of gambling,
 - Ensuring that gambling is fair and transparent.

This policy is in line with our core values at The Children's Trust. It applies to supporters, visitors, our local communities, etc. who feel the need to raise a complaint about our lottery or other prize led fundraising activities, lottery service delivery and/ or lottery communications. It applies to any staff and volunteers who take part in such activities.

3 Definitions

Unless otherwise stated, the words or expressions contained in this document shall have the following meaning:

The Charity/ organisation/ TCT	-	means The Children's Trust
SOP	-	Standard Operating Procedure
LCCP	-	Licence Conditions and Codes of Practice
ELM	-	External Lottery Manager
Primary Named Person	-	Member of TCT staff who directly converses with the Gambling Commission
Key Position who holds a	-	Named on the operating licence as a person qualifying position i.e., lottery promoter
ADR	-	Alternative dispute resolution provider

4 Policy Statement

Sometimes we get things wrong, and when we do, we would like you to let us know that you're unhappy. We value supporter feedback and welcome the opportunity to respond.

- Above all, we aim to resolve all complaints agreeably and efficiently.
- We will endeavour to provide a fair complaints procedure that is easy to access, clear, and simple to use.
- We will be honest in our dealings with complaints and ensure complaints are investigated thoroughly.
- We are committed to learning from complaints and will take action to improve.

5 Stakeholder Consultation

Appendix 1 details the stakeholders who were consulted in the development of this policy

6 Related Policies and Procedures

The following policies and procedures stated below support the effective application of this policy and SOP:

- FR001 Fundraising, Communications and Retail Complaints Policy

7 External References and Guidance

The following external resources and guidance were consulted in drafting this policy and SOP:

- Gambling Commission's Licence Conditions and Codes of Practice (LCCP) <https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/handling-complaints-and-alternate-dispute-resolution-adr>

8. Standard Operating Procedures (SOP)

What is a complaint?

A complaint is an expression of dissatisfaction, whether spoken or written, about any aspect of the way we conduct our licensed activities. For example, a complaint:

- About the outcome of a lottery/ raffle,
- About the way a lottery/ raffle transaction has been managed,
- That concerns the way we carry out our activities in relation to the three licensing objectives.

How does someone file a complaint?

Every complaint will be taken seriously and fully considered by The Children's Trust in order that a satisfactory resolution can be achieved.

Any complaints regarding our lottery can be made directly to The Children's Trust by contacting our dedicated supporter care team at The Children's Trust, Tadworth Court, Tadworth, Surrey KT20 5RU, or by emailing supportercare@thechildrenstrust.org.uk. Alternatively, complaints can be made to

our external lottery manager (ELM), Sterling, by calling 0330 123 1475 (Mon - Fri, 9am - 5pm), emailing - info@unitylottery.co.uk, or in writing to Sterling, giving full details of the complaint and any supporting documentation. Sterling will inform The Children's Trust of any complaint they receive at the earliest opportunity.

We will endeavour to provide a full response to the complainant/supporter within 7 working days of receipt of a complaint. If this is not possible, an acknowledgement of the complaint will be communicated to the complainant within 5 working days of receipt of the original complaint, along with this Complaints procedure and The Children's Trust's 'Supporter Promise', where relevant. The complainant shall also be informed of the reason for the delay.

A full response detailing the outcome of the investigation will aim to be communicated to the complainant in writing within 8 weeks of receipt of the complaint. If we are unable to meet that deadline due to exceptional circumstances, we will let the complainant know.

Anonymous complaints will be documented and investigated but outcomes not communicated.

In the event that a satisfactory outcome can still not be reached within 8 weeks, the matter will be referred to our ADR, The Independent Betting Adjudication Service (IBAS), which acts as an impartial adjudicator on disputes that arise between gambling operators and their customers.

8.1 Complaints Procedure

As a member of the Fundraising Regulator and as a licensee of the Gambling Commission, The Children's Trust has made a commitment to both good practice in Fundraising and in particular to have a complaints procedure that complies with the requirements of these bodies. This includes keeping a comprehensive record of all complaints received, a timely response and a mechanism for addressing concerns that a complaint has not been appropriately dealt with.

The Children's Trust remains committed to developing and maintaining excellence in prize-led fundraising and in exceeding our supporters and customers' expectations in terms of complaint resolution. The Fundraising Regulator complaints process can be found on their website.

The Children's Trust is required to submit annual returns to both the Gambling Commission and the Fundraising Regulator detailing the number and nature of complaints received and the extent to which complaints were resolved amicably with supporters and members of the public with regards to fundraising activities. In the case of the Gambling Commission, we are also required to submit information on complaints which were not resolved and referred to our ADR.

Complaints, both verbal and written, will be dealt with in a swift and effective manner which ensures complete fairness for both complainant and staff. Complaints will be recorded on the charity's central Incident and Risk Assessment Recording system (IRAR). They will then be investigated, findings will be communicated, and processes will be recorded in the manner detailed in this policy, to ensure a consistent approach.

Complaints will be reviewed in every monthly status meeting with our ELM, Sterling, to ensure that they inform our continuous drive to improve our fundraising, prize-led operations and awareness raising work, and any required improvements.

8.2 Guidance

8.2.1 Once a complaint has been received it should be entered on IRAR by the person receiving it. A complaint may be made directly to The Children's Trust or via our ELM, Sterling. The Children's Trust will provide the complainant with acknowledgement of receipt of the complaint within 24-hours. If the complaint has been received by Sterling, they will inform The Children's Trust immediately and attempt to resolve the issue themselves in the first instance. If they're unable to resolve the situation they will escalate it to The Children's Trust at the earliest opportunity. Regardless of how the complaint is received, the complaint must also be reported to the department head at the earliest opportunity who will ensure that the complaint has been properly recorded. The department head will then investigate it themselves or appoint a senior manager to conduct an investigation.

8.2.2 All complaints will be thoroughly investigated and concluded in the appropriate manner and as swiftly as possible, (without compromising the integrity of the investigation), and in any event not longer than 8 weeks.

8.2.3 Every endeavour will be made to provide a full response to the complainant/supporter within 7 working days of receipt of a complaint. If this is not possible, an update on the complaint will be communicated to the complainant within 5 working days of receipt of the original complaint, along with this Complaints procedure and The Children's Trust's 'Supporter Promise' where relevant. The complainant shall also be informed of the reason for the delay. A full response detailing the outcome of the investigation will aim to be communicated to the complainant in writing within 8 weeks of receipt of the complaint. If we are unable to meet that deadline due to exceptional circumstances, we will let the complainant know.

Anonymous complaints will be documented and investigated but outcomes not communicated.

8.2.5 If the complainant is not satisfied with the outcome, the charity will inform the complainant of the opportunity to take the issue to our ADR, The Independent Betting Adjudication Service (IBAS), which acts as an impartial adjudicator on disputes that arise between gambling operators and their customers. This service is provided free of charge to the complainant.

8.2.6 All complaints will be entered onto The Children's Trust's Incident and Risk Assessment Recording system (IRAR). This information source will be available for inspection by managers from within The Children's Trust on request.

8.2.7 Department Heads will ensure they operate the complaints procedure detailed in this policy document to enable the consistent and meaningful reporting and monitoring of complaints. Department Heads will report any complaints received to the Director at the earliest opportunity.

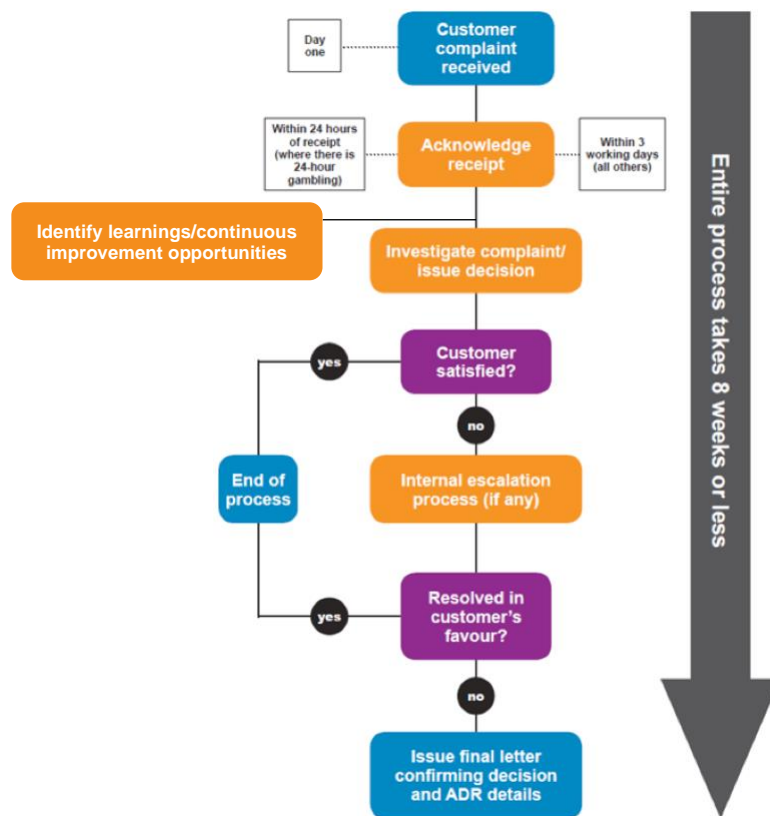
8.2.8 Where a complaint may lead to a legal or regulatory issue, may result in a financial claim or adverse PR for the charity, the Director must be informed as soon as is reasonably practical. The Director will inform the Chief Executive/Senior Leadership Team and/or Board of Trustees, as appropriate.

8.2.9 Both the complainant and any person complained about should be kept fully and properly informed about the progress of the investigation, particularly if there are unavoidable delays in resolving a complaint.

8.2.10 Any members of staff who can help with the investigation of a complaint are expected to assist by providing full information to the complaint handler.

8.2.11 The Children’s Trust recognises the implications of the Public Interest Disclosure Act 1999. This Act gives legal protection to employees against being dismissed or penalised for disclosing genuine concerns they may have on serious issues, for example, malpractice. This is sometimes known as “whistle blowing”. Guidance for staff and managers on ‘whistle blowing’ are to be found in the HR Library (HR105 Whistleblowing). The charity will handle any complaint from a member of staff in accordance with the Act.

Flowchart: Complaint process timescales



Document Change Control

Version	Status	Description (of changes)	Reviewed by	Reviewed/ Issued Date
0.1	Draft	Template policy wording, supplied by Sterling	MW & EMc	
0.2	Draft	Template policy wording, supplied by Sterling transferred into TCT policy template	MW & PF	
0.3	Draft	Small formatting tweaks	Mark Boag	24/03/22
0.4	Draft	No comments re content	Liz George	16/09/22
0.5	Draft	Amended by MB after guidance from Sterling	Sterling, MB and MW	13/12/22

0.6	Draft	Amended complaint process timescale flowchart based on Trustee feedback	Lisa Flanagan	31/01/23
1.0	Final	Approved	Board	Jan 2023
1.1				

Appendix 1 – Stakeholder Engagement Checklist

Review and complete the following checklist to indicate which stakeholders were consulted in the development of this policy.

#	Question	Yes/ No	Stakeholder(s) to be consulted
1	Is there a statutory requirement to have in place this particular policy/ does the policy need to comply with detailed legislation?	Yes	Audit, Risk and Governance team
2	Is implementation of the policy (or any element of it) dependent on the use of new or existing information technology?	No	Head of IT
3	Does implementation of the policy (or any element of it) place any demands on/ or affect the activities of the Estates and Facilities teams (e.g. does it impact the provision or maintenance of premises, equipment, vehicles or other TCT assets)?	No	Head of Estates
4	Does implementation of the policy or any element of it involve/ impact the processing of personal data?	Yes	Data Protection Officer
5	Does implementation of the policy require significant unbudgeted operational or capital expenditure?	No	Finance Director
6	Does implementation of the policy (or any element of it) directly or indirectly impact on the delivery of services / activities in other areas of the organisation? E.g. a policy written by a clinical lead in CF&S might impact on the delivery of care for CYP attending the School.	No	Relevant, impacted OLT members
7	Is there a need to consider Health and Safety or potential environmental impacts in developing and implementing the policy?	No	Health and Safety Manager
8	Have you consulted with a representative of those who will be directly impacted by the policy?	No	
9	Is there a need to consider Equity, Diversity and Inclusion in developing and implementing the policy?	No	EDI Lead
10	Is there a need to consider sustainability and potential environmental impacts in developing and implementing the policy?	No	Lead for Responsible Organisation
11	Please detail any other stakeholder groups consulted, if applicable.	Yes	Sterling Management Centre Limited (Our external lottery manager)