Fundraising, Communications, Retail and Prize Led Complaints Policy	
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Policy

1 Purpose and Objectives

To set out the approach to managing and addressing complaints about The Children's Trust fundraising (including lottery, raffle or prize-led fundraising activity), marketing and retail activities.

The Children's Trust remains committed to developing and maintaining excellence in fundraising and charity retail standards and in exceeding our supporters and customers' expectations in terms of complaint resolution. However, we need to provide opportunities for staff, volunteers and the public to provide feedback - and if they wish, raise a complaint about our work. It is vital that when a complaint is raised, we properly record, assess and respond to it. This policy sets out how we will manage any complaint we receive, whether directly to us, to a volunteer, a third-party acting on our behalf, or to a regulator.

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 to have a complaints procedure that complies with the requirements of these bodies. This includes keeping a comprehensive record of all complaints received, providing a timely response and a mechanism for addressing concerns that a complaint has not been appropriately dealt with. This policy may differ from other complaints policies which relate to service delivery.

The Fundraising Regulator complaints process can be found on their website:
https://www.fundraisingregulator.org.uk/complaints

The Children's Trust is required to publish the number of complaints received relating to fundraising and retail activities in its Annual Report and Accounts. The charity is also encouraged to self-report incidents that may involve a breach of the Code of Fundraising Practice to the Fundraising Regulator. The charity is required to submit annual returns to the Gambling Commission 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 prize led fundraising activities. We are also required to submit information on complaints which were not resolved and referred to our ADR (alternative dispute resolution provider).

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 system for recording incidents, at time of writing, complaints are recorded on a MS Form until a new incident management system is launched. 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.

All complaints, including those about our prize led fundraising, will be reviewed to ensure that they inform the drive to continue to improve our fundraising, retail operations and awareness raising work. Complaints about our prize led fundraising will be reviewed in monthly status meetings with our ELM (external lottery manager), Sterling, and required improvements will be implemented as a matter of urgency.

The objective of this complaint procedure is to ensure a consistent, fair and timely approach to the investigation of all complaints, and to ensure that The Children's Trust's complaints procedures reflect best practice.

Complaints will be treated as a positive opportunity to improve the quality of our work. The findings of complaints investigations will be used to improve services, reduce untoward incidents and to improve the overall quality of the work of the Directorate.

2 Scope

The policy applies to all internal and external marketing and fundraising communications and programmes and both online and offline trading operations. We define a complaint as **an expression of dissatisfaction made to us by any means; about any aspect of the way we conduct these activities.**

With regards to the activities for which we hold a Gambling Commission licence, a complaint could be:

- 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
- concerning 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,
    - Keeping 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, known as Our Promises. It applies to supporters, visitors, our local communities etc. who feel the need to raise a complaint about our fundraising activities, lottery service delivery and/or communications. It applies to any staff and volunteers who take part in such activities. It also applies to complaints made about or to our fundraising partners.

3 Definitions

3.1 For the purposes of this policy, a complaint is defined as, **"an oral or written expression of dissatisfaction regarding any aspect of The Children's Trust's fundraising, retail activity and/or awareness raising activities".**

3.2 A complainant can be (i) an existing supporter i.e. a supporter recorded on our database, a donor of goods to the shop, a customer or a volunteer; (ii) a member of the public who has raised a complaint in relation to our fundraising, retail or marketing activities; iii) a member of staff; or iv) a beneficiary of our services or a member of their family.

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 Person	Named on the operating licence as a person who holds a qualifying position i.e. lottery promoter
ADR	Alternative dispute resolution provider
Working week	is defined as Monday to Friday

4 Policy Statement

As a member of the Fundraising Regulator, The Children's Trust has made a commitment to work to the highest standards in our fundraising and to have a complaints procedure that complies with the requirements of the regulator. This includes keeping a comprehensive record of all complaints received, investigating complaints thoroughly and fairly, providing a fair and timely response in a way that is appropriate to the complaint and providing a mechanism for addressing concerns that a complaint has not been appropriately dealt with.

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 and put it right.

- 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 regularly reviewing to learn from complaints and will take action to improve.
- Anyone that makes a complaint will be protected from victimisation and harassment

5 Stakeholder Consultation

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

6 Related Policies and procedures

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

- Vulnerable Persons for Fundraising Policy
- The Children's Trust Online Shop Refunds and Returns
- Reporting and learning from Near Misses, Incidents and Patient Safety Events Polic and Procedure including Duty of Candour

7 External References and Guidance

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

- The Fundraising Regulator Code of Fundraising Practice
- The Chartered Institute of Fundraising guidance
- Charity Retail Association
- 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

Standard Operating Procedure (SOP)

1 Roles and Responsibilities

All staff and volunteers who work in fundraising, retail or communications roles interact with members of the public and are therefore responsible for implementing the following processes and procedures.

When a new staff member or volunteer joins the organisation, the reading and understanding of this policy should form part of their induction and probation objectives. A recap on the policy and sharing learning from complaints should also be included periodically through team or department meetings.

When working with third parties, the lead fundraiser, heads of team and legal support should ensure contracts include how the third-party manages complaints. If a fundraising partner does not have a suitable clear and publicly available complaints procedure of their own, they must agree to follow the charity's.

2 Process / Procedure

Guidance

Complaints should be made as soon as possible after the incident and within twelve months of the incident to enable the charity to investigate effectively with the aim to learn and improve fundraising practice and ensure compliance.

Any complaints regarding fundraising, lottery, retail or marketing 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 about lottery can be made to our external lottery manager (ELM), Sterling, by calling 0330 123 1475 (Monday - Friday, 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.

Once a complaint has been received, it should be entered on the central system for logging incidents and complaints, (at time of writing this is a MS Form to Report an incident until the new incident management system is launched) by the person receiving the complaint and reported to the relevant department head at the earliest opportunity. They will ensure that the complaint has been properly recorded. The department head will then investigate it themselves or appoint a senior manager to investigate.

All new incidents will be reviewed at the weekly patient safety event and incident review meeting.

The incident management system will continue to be updated with any responses and then closed off once resolved. A record of correspondence will be saved on the CRM system.

All complaints will be thoroughly investigated and concluded in the appropriate manner and as swiftly as possible (without compromising the integrity of the investigation).

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 Head of Marketing and Communications and Chief Executive / Senior Leadership Team and/or Board of Trustees, as appropriate.

Stage 1 Local Resolution

An acknowledgement of the complaint will be made in writing **within three working days** following receipt of the complaint, along with this complaint's procedure and The Children's Trust's 'Supporter Promise' where relevant.

An investigation into the complaint will commence as soon as possible following receipt of the complaint.

Full response: Every endeavour will be made to provide **a full response** in writing to the complainant/supporter **within seven working days** of receipt of a complaint.

A full response detailing the outcome of the investigation must be communicated to the complainant in writing **within four working weeks of receiving the complaint**. Anonymous complaints will be documented and investigated but outcomes not communicated.

Holding response: If it is likely **the four working weeks deadline will not be met**, for example if the investigation requires more time, **a holding letter** should be sent on **15th working day** indicating a revised timescale. The complainant shall also be informed of the reason for any delay.

Stage 2 Complaint Review

If a complainant is dissatisfied with the outcome of the investigation, they must be advised of the opportunity, in the first instance, to refer the complaint to the Director of Fundraising and Communications or to escalate to the CEO if sufficiently serious (Stage 2). The director will instigate a further investigation, either conducted themselves, or by their appointed representative. They will inform the complainant of the outcome of their investigation within 30 working days or advise them of the need for further time to conclude, with a deadline.

Stages 3

If the complainant is still not satisfied by the outcome, the charity will inform them of the opportunity to escalate the issue take the issue to the Fundraising Regulator where applicable. Details of how to make a complaint about a charity can be found on the Fundraising Regulator website Make a complaint | Fundraising Regulator

In relation to complaints about our prize led fundraising, if 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.

In all stages, 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. 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 to resolve issues promptly.

Confidentiality of complaints

The Children's Trust will maintain confidentiality and protect privacy throughout the complaints process in accordance with UK General Protection Data Regulation and Data Protection Act 2018. We will only collect and disclose information to those staff who are involved in the consideration of the complaint.

Reporting

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 of Fundraising must be informed as soon as is reasonably practical. This will be escalated to the CEO and/or Senior Leadership team at the earliest opportunity and recorded at the Senior Leadership Team meeting with agreed actions. Themes of complaints received and actions taken will be reported to the Trustees via the Finance, Resources and Investment Committee.

Complaints will be reviewed at the weekly patient safety event and incident review meeting along with all other incidents.

Where learning can be shared to lead to service improvement complaints will be anonymised to protect the confidentiality of the people involved.

Complaints relating to other departments

If a complaint is received into the Fundraising, Communications and Retail Directorate, but needs to be answered by another Department, it should be forwarded without delay to the appropriate person along with any accompanying paperwork. This complaint should be included in the regular complaint report to the Director of Fundraising and Communications with the name of the person to whom it has been forwarded. If the team receiving the complaint felt that it was appropriate to acknowledge the complaint before forwarding it to another department, this acknowledgement should be included with the forwarded complaint and a copy sent with the logged complaint as part of the report to the Director of Fundraising and Communications.

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 "whistleblowing". Guidance for staff and managers on 'whistleblowing' are to be found in the Whistleblowing Policy on The Loop. The charity will handle any complaint from a member of staff in accordance with the Act.

Feedback

At least twice a year the Fundraising, Retail and Communications Leadership Team will review the complaints received and remedial actions taken. The trends in complaints will also be reviewed and learning shared across the Directorate, with SLT and the board committee

The total number of complaints received relating to fundraising or retail activity should be reported in each year's Annual Report and Accounts.

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	Draft	Updating the Policy to reflect changes in the Fundraising Regulator Code of Practice. Merging the Complaints Policy & Procedure for Prize Led Fundraising into the Fundraising, Comms and Retail Complaints Policy.	FS	Jul 2025
2.0	For approval	Timing of response changed to aligned to complaints in services policy and enable one workflow. Number of stages of escalation reduced from four to three to align with other policy Other edits to closer align to the other complaints policy including 12 months to raise a complaint and confidentiality added.	FRCLT	Oct 2025
2.0	Final	Approved	FIRC	Nov 2025
2.1	Draft			

Appendix 1 - Stakeholder Engagement Checklist

#	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?	Y	Compliance with the Fundraising Code of Practice and Gambling Commission 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?	Y	New incident management system. Head of Retail part of the group leading the procurement process
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)?	N	Head of Estates
4	Does implementation of the policy or any element of it involve/ impact the processing of personal data?	Y	Data Protection Officer
5	Does implementation of the policy require significant unbudgeted operational or capital expenditure?	N	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 CFandS might impact on the delivery of care for CYP attending the School.	N	
7	Is there a need to consider Health and Safety or potential environmental impacts in developing and implementing the policy?	N	Health and Safety Manager
8	Have you consulted with a representative of those who will be directly impacted by the policy?	Y	Representatives from FRCLT
9	Is there a need to consider Equity, Diversity and Inclusion in developing and implementing the policy?	N	EDI Lead
10	Is there a need to consider sustainability and potential environmental impacts in developing and implementing the policy?	N	Lead for Responsible Organisation
11	Please detail any other stakeholder groups consulted, if applicable.		Clinical Governance Caroline Raynsford, Quality, Risk, Patient Experience and Safety Lead Bethan Eaton-Haskins, Director of Nursing and Quality