Compliments, Comments Complaints Policy and Procedures

Last reviewed by: Reena Begum
Date: April 2026

Next review date: April 2027
Policy stored on: Ogden's intranet, Website & People HR

1. Introduction

1.1 The Ogden Trust aims to be an organisation that is open to learning and continuous improvement at all levels. We welcome all compliments, comments and complaints and we encourage everyone to let us know about their experience and how we can improve.

1.2 The Charity Governance Code is the standard for good governance in charities. The Code expects the Trust to have in place "a transparent, well-publicised, effective and timely process for making and handling a complaint, and that any internal or external complaints are handled constructively, impartially and effectively".

This Code informs the Trust's policy with regards to dealing with any complaints; the policy is further underpinned by the Trust's commitment to building trust, confidence and collaboration with our stakeholders.

1.3 We aim to create and perpetuate an inclusive, responsive and positive environment for anyone involved with the Trust and our activities – we listen to our community and want to create a welcoming space for everyone. If we fall short of this commitment, we want to learn from our mistakes and encourage people to share any complaints or concerns.

1.4 The Trust will consider any conflicts of interest that may arise where one, or more, member of the Ogden staff or trustees is the subject of the complaint, and in relation to any appeal. The Trust will take appropriate and reasonable steps to manage those conflicts of interest, insofar as that is practicable within the Trust.

1.5 The overall responsibility for this policy and its implementation rests with the Head of Operations.

2. Scope

2.1. This policy applies to all trustees, employees and consultants who act on behalf of The Ogden Trust who may receive or handle complaints.
2.2. Where an employee of The Ogden Trust wants to raise concerns about their employment/engagement, those matters should be addressed in accordance with the Trust's employment/HR policies, such as an internal Grievance, Whistleblowing and Bully & Harassment policy, rather than as a complaint under this policy.
2.3. The Ogden Trust will not be able to address a complaint unless it includes sufficient information to allow the matter to be properly reviewed and investigated.
2.4. Where the Trust has reasonable grounds, based on the evidence available to them, for assessing that a complaint has not been raised in good faith or is not an appropriate use of this policy, they may disapply it and will provide the complainant with their reasons for making this decision. An example would be that the complaint has been raised in order to harass or cause distress to an individual or where a complaint raises the same or very similar matters to those that have been addressed in a previous complaint.
2.5. Some complaints may relate to other policies that the Trust has in place, such as for safeguarding, whistleblowing or discrimination/harassment. If any of these other policies are relevant to the nature of the complaint that is raised, the Trust will inform the complainant that the matter is being dealt with in accordance with that other policy, as described below. This may be important in order to ensure that the Trust is complying with its legal obligations, particularly in relation to safeguarding.
2.6. The Trust is committed to ensuring that complaints are handled sensitively. The Trust has specific obligations and commitments in relation to data protection and privacy. The Trust cannot guarantee to keep the fact and details of your complaint confidential if it is necessary and proportionate to share your data in order to review and resolve your complaint. On occasion, the Trust may need to involve third parties, such as the local authority, the police and the Charity Commission. The Trust may also need to take legal advice and to share information with its professional advisers.
2.7. This policy does not form part of any legal agreement or contract by or on behalf of The Ogden Trust.

3. Definitions

3.1 **Compliments** – A compliment is an expression of praise concerning The Ogden Trust or a service provided by the Trust.
3.2 **Comments** – A comment is a remark, observation or criticism that may require action but does not require a full investigation.
3.3 **Complaints** – A complaint is any expression of dissatisfaction, about any aspect of The Ogden Trust, or any third parties or volunteers whose affiliate with The Ogden Trust.

4. How to send us your complaint, compliment, or comment

Please complete this form to provide us with details of any compliments, comments or complaints. If you would like assistance completing the form or require reasonable adjustments, please contact the Head of Operations.

5. Acknowledgment of complaints

5.1. Upon receipt of a complaint or confirmation of the written record of a complaint, The Ogden Trust will formally acknowledge it within 5 working days.
5.2. Where a complaint is made verbally, the Head of Operations, will respond to the complainant within 3 working days, advising them to complete the form on our website.
5.3. If any other person in the Trust receives a complaint, they should ask the person to use the form to submit it.
5.4. Complainants will be informed of this policy and provided with a copy, if requested.

6. What we will do with your communications with us

6.1. Comments and compliments

These are collected by the Head of Operations and reviewed at monthly leadership meetings, then shared with wider team at quarterly staff meeting. We monitor and evaluate all our work, and gather feedback at times throughout the year, but through our comments and compliments you can let us know what you think at any times and your thoughts will be reviewed by The Ogden Trust.

6.2. Complaints

If you face real time physical harassment, verbal harassment and psychological harassment or other behaviour deemed as harassment, please speak with an Ogden member of staff immediately for a prompt response. Alternatively (and/or additionally), you can follow the procedure in line with this policy.

We aim to use the framework below - we might not need to use all these steps, and they may not need to happen in this order.

Measure	Outcomes
1-1 conversation with Head of Operations	Outlining the key details of your complaint and forming a summary for your and our records
1-1 conversation with Chief Executive or Director of Education	Identifying any further information we need to understand your complaint; identifying any individuals as the subject of your complaint; identifying what the complainant would like to see happen to feel safe and that their concerns have been resolved; referring the complainant for further support if necessary or desired
Reviewing additional material	Exploring other materials such as social media records; emails; digital event recordings & chats; speaking to any witnesses of an occurrence

1-1 meeting with Head of Operations, Chief Executive and Director of Education (if applicable)	Establishing acceptance or denial of having caused harm; exploring whether they would like to learn about their behaviour and may benefit from referral to training on a specific issue e.g. language, discrimination, relationship management; exploring the option of an apology or acceptance of fault, and next steps to improve; ensuring the subject of the complaint feels they have been given all the appropriate information and informed of how they will be kept updated.
Meeting arranged between complainant and subject of complaint (with an external facilitator if requested)	Opportunity to explore accountability and apologies; understanding how to avoid causing harm again

6. Who should use this policy and procedure for complaints

7. Complaint register

7.1. All complaints will be logged in the trust's designated complaints register upon receipt, including the date, time, nature of the complaint and any other relevant information. Once the investigation has been completed It will not contain or refer to the identity of the complainant, and the register will therefore be an anonymised record of complaints. The complaints register is a matter of record for senior leadership at The Ogden Trust, and they will review it periodically.

8. Initial review

8.1. The nominated person, Head of Operations will carry out an initial review of the complaint to confirm that it falls within the scope of this policy. They will then provide an initial response to the complainant within two weeks, setting out:

8.1.1. Whether or not the complaint will be handled in accordance with this policy. If not, which other policy applies and the next steps. If it does, the further information that follows;

8.1.2. Who will be responsible for communicating with the complainant, and their contact details – this will usually be Head of Operations;

8.1.3. The likely timeframe for the investigation and a response.

9. Investigation and resolution

9.1. **Nominated person**: Head of Operations will be responsible for investigating the complaint. The Head of Operations will be someone who is independent of any person that is the subject of the complaint, insofar as this is possible with The Ogden Trust. If the complaint relates to the Head of Operations, the nominated investigator will be the CEO. The investigator will gather all necessary information, including contacting the complainant if required, and work towards a satisfactory resolution of the issues raised in the complaint.

9.2. **Timescales**: The Ogden Trust aims to resolve complaints as promptly as possible. Complex complaints may require more time for investigation, but the Trust will provide regular updates to the complainant regarding the progress and expected timeframe for a response.

9.3. **Resolution**: Depending on the nature of the complaint, the complainant will usually be notified of:

9.3.1. The steps the Trust has taken to investigate the complaint;

9.3.2. The conclusions drawn from the investigation; and

9.3.3. Any actions taken as a result of the investigation,

9.3.4. Where it is appropriate to share such information.

Note: While the Trust aims to provide as much information as possible, it may not always be appropriate or permissible to disclose full details of any action taken, for example, where confidentiality obligations or data protection considerations apply.

10. What we can't do

10.1. As part of our commitment to transparency, it is important to explain our approach and why we cannot act in certain situations. The Ogden Trust is a small organisation and while we will always take complaints seriously, we want to be realistic about our capacity to carry out significant vetting, information gathering or interviewing. In the extremely rare cases where this might be necessary The Ogden Trust would likely seek independent external support.

10.2. Some examples of where we will not be able to act include:

- Ogden Trust will have limited power and action to act when others participate in events and demonstrate behaviours that is deemed inappropriate.
- Where Ogden funding has been used to commission an external delivery of Continuous Professional Development (CPD) or enrichment activity.
- Behaviour of individuals participating in Ogden programmes where that behaviour has occurred outside of our activities. These should be referred to their employer.
- Complaints that make allegations about opinions but not behaviours

- We cannot respond to complaints about other occurrences across the charity sector
- We also have limited power to take actions on issues carried out by Ogden funded schools or teachers using the school's Ogden funding.

If any Ogden participate is subject to significant disciplinary by their employer, we will act in line with the employer for sanctions. The participate will not be able to participate in any Ogden's programmes or enter any schools ground on Ogden's business during the suspension.

The Ogden Trust cannot police thoughts and we want to create an environment in which a range of opinions can co-exist respectfully and professionally. If personal beliefs are enacted in discriminatory comments, behaviours or correspondence we will act in line with his policy.

11. Confidentiality

11.1. Complaints may be shared with any or all of the senior leadership staff at The Ogden Trust, if appropriate and taking account of any conflicts of loyalty that they may have in relation to the substance of the complaint.

11.2. If the complaint relates to a named individual, the Trust may inform that person as to the nature of the complaint in the course of their investigation and seek a response from them. The identity of the complainant will not be shared with the subject of the complaint unless the subject of the complaint raises a Data Subject Access Request (DSAR). Sensitive information about the complainant will only be shared with the named individual to the extent that it is necessary to do so for the complaint to be properly investigated.

11.3. Where a complaint relates to a member of staff, the Trust may need to carry out its investigation in accordance with its internal employment/HR policies and governance procedures. The nature of these internal processes, data protection considerations and the expectation of confidentiality that staff are entitled to may mean it is not appropriate to provide the complainant with full details about the process being followed or the outcome of that process, where that has not been agreed to by the staff member or trustee. However, we would normally expect to be able to inform the complainant of:

11.3.1. the completion of the initial investigation;

11.3.2. the fact that an internal process is being followed; and

11.3.3. the completion of that internal process.

12. Communications during process

12.1. Throughout the complaints handling process, clear and transparent communication with the complainant is essential. The Trust will use its best endeavours to keep the complainant informed of the progress, any delays, and the final outcome of the investigation.

13. Closure and follow up

13.1. Once the complaint is resolved, The Ogden Trust will formally close the matter and record the outcome in the complaints register as anonymised. Head of Operations may also conduct follow-up checks to ensure that the resolution remains effective.

14. Appeal

14.1 If the complainant is dissatisfied with the outcome of their complaint or the way in which the complaint has been handled, they should send a written appeal to the Head of Operations

within three months of being told of the outcome. If an appeal is raised at a later date, The Ogden Trust will decide whether or not it is appropriate to consider it, acting in the best interests of the Trust.

14.2 Head of Operations will acknowledge receipt of the appeal within two weeks.

14.3 The trustees will identify someone other than the original investigator to lead on the appeal process. This person will review the original evidence, the investigation report and the grounds for the appeal set out by the complainant but will not reinvestigate or open new lines of enquiry, to assess whether or not the original decision was within the range of reasonable conclusions that the Trust could draw, based on the evidence that was available to them.

14.4 The Trust will collectively consider the findings of the person conducting the appeal process and will notify the complainant of the outcome. They will aim to do so within two months of receipt of the appeal notice or will otherwise provide an update to the complainant within that time, setting out the timescales that will apply.

14.5 The outcome of the appeal will also be recorded in the complaint register.

14.6 The appeal decision will be considered final.

15. Further steps

15.1 If the complainant is not satisfied with the outcome, they may complain directly to the Trust's charity regulator, the Charity Commission, whose website sets out the kinds of issues that they can assist with.

15.2 The Charity Commission - https://www.gov.uk/government/organisations/charity-commission

16. Continuous improvement

16.1. The Ogden Trust is committed to continually reviewing and improving the Trust's complaints handling process to ensure they can fulfil the Trust's charitable purposes effectively and prevent future complaints. Feedback received through the complaints handling process will be analysed, and any necessary adjustments to policies, procedures, or employee training will be implemented.