

Complaints and Compliments Management Policy

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Purpose

The National Autistic Society is committed to providing high quality, transparent and accessible services to everyone we support across adult and children services and other support networks. To do this we need you to tell us when we do things well and when we get things wrong.

- We want to help resolve all complaints as quickly as possible.
- We will handle any expression of dissatisfaction with our services which calls for a response as a complaint.
- We will listen to your complaints, treat them seriously, and use any feedback received from complainants to enable us to develop and improve our services.

Scope

Our policy covers complaints about:

- The standard and quality of service you should expect from us
- The behaviour and professional conduct of our staff in delivering that service
- any action, or lack of action, by our staff or others engaged on National Autistic Society business

This policy applies to all National Autistic Society employees, trustees, stakeholders, families of people supported in our services and people the National Autistic Society provides support to.

This policy also covers situations where feedback is received from those not employed by the National Autistic Society, for example:

- Someone supported in a National Autistic Society Service or Student Support or receiving any service from the National Autistic Society including access to online forums
- On behalf of those who are unable to complete the process independently (as defined by the Mental Capacity Act 2015 or the Adults with Incapacity (Scotland) Act 2000 or the Mental Capacity Act 2016 Northern Ireland)
- A person who has been asked to do so by the person affected
- A National Autistic Society Member or member of an organisation related to the National Autistic Society; a funding organisation / fund raiser.
- A member of the public
- National Autistic Society volunteers
- People supported by National Autistic Society volunteers

In the event that a complaint relates to a National Autistic Society School, the complainant will be referred to the Complaints Resolution Policy (Schools) QS-0010.

For National Autistic Society Schools and Children's Services refer to Complaints Resolution Policy QS-0010.

Further information can be found here: [Complaints Resolution Policy \(Schools\)](#)

This policy does not apply to situations where staff wish to make a complaint about another staff member or internal process. In these instances, staff will be referred to the Grievance Policy, staff may also report their concerns anonymously through Safecall.

Legal framework

Compliance with this policy will ensure that the National Autistic Society operates a robust complaints process which meets the applicable standards and operates in accordance with:

- The Local Authority Social Services and National Health Service Complaints (England) Regulations 2009
- Health and Social Care Act 2008
- The Disability Discrimination Act 1995
- Human Rights Act 1998
- The Equality Act 2010
- The Mental Capacity Act 2005 (MCA)
- Mental Capacity Act (Northern Ireland) 2016 (UK)
- Adults with Incapacity (Scotland) Act 2000
- The Online Safety Act 2023
- Complaints Matter, CQC 2014
- Principles of Good Complaint Handling identified by The Parliamentary and Health Service Ombudsman 2009
- Independent healthcare (IHC) complaints procedure 2016
- Providing feedback about care services in Wales 2021
- Local Government & Social Care Ombudsman, Top Tips for Making a Complaint 2023
- Gambling Commission
- The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015

Roles and Responsibilities

Chief Executive Officer

The Chief Executive Officer (CEO) holds overall responsibility for the Complaints and Compliments Management Policy. As the accountable officer, the CEO oversees the organisation's management and ensures that effective systems are in place to support service delivery and operational continuity.

Effective complaints management is central to this responsibility, helping to ensure that policies, procedures, and training are appropriate, up to date, and aligned with continuous improvement and lessons learned.

Executive Leadership Team

The Executive Leadership Team (ELT) supports this policy by coordinating actions to address organisation-wide risk management issues, for example, approving additional financial resources to enhance services or undertaking remedial actions identified through complaint investigations.

Head of Incidents and Complaints

The Head of Incidents and Complaints is responsible for coordinating the complaints investigation process, ensuring consistency, quality, and compliance across the organisation. Key responsibilities include:

- Recording all complaints and compliments received via email on the digital reporting system.
- Acknowledging and responding to complaints received via email, or confirming they have been acknowledged by the relevant service or department.
- Appointing an investigator to carry out a Stage 2 investigation when a complaint outcome has been appealed.
- Quality assuring the overall complaint investigation process.
- Reviewing and quality assuring the response letter drafted by the investigating officer.
- Developing and assigning an action plan based on the investigation's findings and recommendations.
- Ensuring that organisational lessons learned are effectively disseminated following each investigation.
- Provides update to ELT as appropriate (and/or relevant Director).

Service Managers and Heads of Service

Service Managers and Heads of Service are responsible for the effective management of complaints within their areas. Their key responsibilities include:

- Appointing an investigator when a complaint is made.
- Ensuring that all complaints are reported, thoroughly investigated, and that findings are clearly documented.
- Managing risks identified through the complaint's resolution process.
- Disseminating lessons learned to relevant staff and incorporating them into ongoing discussions aimed at continuous improvement.
- Overseeing the timely implementation of actions arising from the Complaints Resolution process.

Commissioning Officer (Where this is not the Head of Incidents & Complaints)

- Reviews Stage 1 complaints and determines if another department is required for the investigation (i.e. HR involvement).
- Appoints Investigator.
- Supports the investigator to write the Terms of Reference.
- Meets with investigator mid-way through investigation for update, and escalating any concerns identified to the Head of Incidents & Complaints.
- Meets with investigator and Head of Incidents and Complaints at end of investigation to receive final report and agree action plan.
- Writes up (or delegates as appropriate) Organisational Learning and brief ensuring this is distributed to relevant audiences and where appropriate shared with the Head of Incidents and Complaints for presentation at the Central Integrated Management Meeting.

Investigating Officer

The Investigating Officer is responsible for:

- Requesting evidence of authority or consent for the subject of the complaint (as appropriate)
- Obtaining evidence of consent or authority (if appropriate).
- Organising interviews for individuals who are identified through the investigation process.
- Collating and reviewing evidence and compiling the investigation report, ensuring that recommendations are made based on the findings of the investigation.
- Drafting the response letter following the completion of the investigation.

Definitions

Complaint

A complaint is an expression of dissatisfaction, whether justified or not.

Compliment

A compliment is an expression of admiration or praise.

Complainant

Complainants are the people making the complaint, whether on behalf of themselves, or a person we support accessing services through the National Autistic Society.

The complainant/ complainants may be:

- A person/ people we support or pupil.
- A third party; someone acting on behalf of the person we support, with their written consent e.g. an advocate, relative, Member of Parliament.
- Parents, carers or legal guardians of children.
- An appointee; someone acting on behalf of a person we support, who is unable to represent his or her own interests, provided this does not conflict with the person's right to confidentiality or a previously expressed wish.

Vexatious Complaint

A vexatious complaint is usually deemed as a complaint that is made without reasonable justification, often intended to cause annoyance, disruption, or harassment even if it appears to lack merit. These complaints are typically unreasonable, repetitive, or aimed at prolonging interaction without offering any new or relevant information. Examples of vexatious complaints include:

- Complaints that are baseless or lack substantive evidence.
- Persistent pursuit of a complaint that has already been addressed or found to be unsubstantiated.
- Repeatedly raising concerns or altering the nature of the complaint to unnecessarily extend the process.
- Making unreasonable or excessive demands for information or responses, placing undue strain on organisational resources.
- Continuously bringing up matters that have already been investigated and resolved.
- Shifting the focus or content of the complaint to delay resolution.
- Complaining repeatedly about trivial or insignificant issues.

- Ignoring investigation outcomes and continuing to pursue the same complaint.

There is no exhaustive list of behaviours that may be considered unreasonable, as each case should be assessed on its own individual circumstances.

Stage 1 Complaint

When a complaint is first raised with the National Autistic Society, it will be handled as a Stage 1 Complaint. These complaints are investigated at a local level by the relevant service or department. The investigation will be overseen by a Senior Manager within that service or department.

Stage 2 Complaint

If the complainant is dissatisfied with the outcome of the Stage 1 investigation, they may appeal the decision in writing. In such cases, a Stage 2 Complaint process will be initiated. The process will be overseen by the Head of Incidents and Complaints and reviewed by the Director of Assurance and Compliance.

Our standards for handling complaints

If you have a concern about a National Autistic Society service or team, the easiest way to get your concern resolved will be to raise it directly with the appropriate service manager (if your complaint is connected with an adult service). If your complaint is about a different part of our charity the easiest way to get your concern resolved will be to raise it directly with the appropriate team manager in the first instance. Your complaint will be documented, ensuring that the outcome and any identified actions are recorded.

We accept complaints via telephone, letter, or email. Where necessary, we can also accommodate alternative methods of communication to meet reasonable adjustment needs. All complaints are taken seriously and handled with the upmost care and respect.

You can expect to be treated with courtesy, respect and fairness at all times. We expect that you will also treat our staff dealing with your complaint with the same courtesy, respect and fairness.

Any information that you give will be shared on a need-to-know basis only, in line with our charity's Data Protection policy.

You have the right to anonymity but if you wish to remain anonymous, we may not be able to update you on the outcome of your complaint or offer you the opportunity to feedback your experience.

We will deal with your complaint promptly:

- We will acknowledge receipt of a Stage 1 complaint within 5 working days where we have return details and you can expect to have a full reply within 28 working days.
- In a few cases we may not be able to send a full reply within 28 working days of receipt, for example, if your complaint is very complex. If this happens and we have your contact details we will tell you the reason why and let you know when we will be able to reply in full, keeping you fully informed of progress.

We will not treat you less favourably than anyone else because of your:

- Sex or legal marital or same-sex partnership status: this includes family status, responsibility for dependents, gender (including gender reassignment, whether proposed, commenced or completed) and sexual orientation.
- Colour or race: this includes ethnicity, national origin or nationality.
- Disability.
- Class, economic or social status.
- Religious or political beliefs, or trade union affiliation.
- Any other unjustifiable factors, for example language barriers, age, pregnancy and maternity.

Investigations may be cross referenced with other parties, where relevant, when external organisations are implicated in the concern raised.

Making a Complaint on Behalf of Someone Else

If you are submitting a complaint on behalf of another individual or individuals, particularly where the concern relates to a person we support, we are required to carry out appropriate checks to ensure we have the legal authority to share personal and confidential information with you.

Where the person (or persons) we support has capacity, you must provide written evidence of their consent. If written consent cannot be obtained, we will liaise directly with the individual to confirm their authorisation for us to communicate and

share information with you regarding their care and the complaint. In these instances, we will record the authorisation details provided.

Where the person (or persons) we support lacks capacity, we will verify whether you have the legal authority to act on their behalf. You may be required to provide evidence of this authority (e.g. a Court of Protection Order, Power of Attorney or relevant legal documentation).

In all cases, consent or proof of authority must be received in order for us to proceed with sharing the outcome of our investigation.

If consent or the necessary authorisation is not received within 10 working days of our initial acknowledgment of the complaint, the case will be closed. A written notification will be issued confirming the closure of the complaint due to insufficient authorisation.

There may be circumstances where a supported person's consent is not required to pass on information, for example:

- A deceased person.
- When not revealing such information would be breaking the law.
- Where there is a risk of harm to an individual or themselves.
- Information is requested by the police, H.M. Coroner, a court or tribunal.
- There are reasonable grounds to suspect abuse of a child or vulnerable adult as per our organisational safeguarding policies and procedures.

Involving the People We Support in the complaints process

It is essential to consider the views and opinions of the people we support throughout the complaint management process. Actively involving them is a crucial step toward enhancing service quality, ensuring accountability and transparency, and identifying areas for improvement within the National Autistic Society. This approach also fosters trust, empowers those we support, and promotes a culture of learning and positive change.

Mental Capacity

Where a person we support has been deemed to have capacity, we will follow their communication plan (where applicable) to ensure that they are fully involved in the complaints process.

Where a person we support has been deemed not to have capacity, we will ensure that the nominated individual/guardian is fully involved in the complaints process.

We will support the person to make their views and opinions heard according to their support plan. On occasions, we may ask for an additional mental capacity assessment to be completed for specific situations.

Safeguarding

If there is a concern about safeguarding an adult or child, or there is a belief that someone may be at risk of serious harm, the National Autistic Society will immediately refer the case to the appropriate statutory agency for adult or children's protection. If there is a safeguarding concern, we will manage this under the appropriate Safeguarding Policy and not through this complaints policy.

Where a complaint is about the manner in which a safeguarding matter has been handled then that complaint will be addressed through this policy.

Please refer to the National Autistic Society website for more information.

Persistent or vexatious complaints

The National Autistic Society operates on the principle that all complaints are made in good faith. Each complaint is assessed on its individual merits. Even if someone has previously submitted a vexatious or malicious complaint, we do not automatically assume that future complaints from the same individual will be of a similar nature.

If a complaint is deemed persistent or vexatious, we will follow our internal procedures for managing such cases and will provide the complainant with a clear explanation of our decision.

How to complain to us

There are a variety of ways that people can make complaints:

- Telephone call to your local service / team
- In writing to your local service/ team
- Email: Your.Views@nas.org.uk

Alternatively, you can send your complaint in writing to:

The Head of Incidents and Complaints
The National Autistic Society
Weston House
42 Curtain Road
London EC2A 3NH

Please note, our offices are for administrative purposes only and are not open to the general public.

Your Rights

If you are dissatisfied with the outcome of a complaint investigation, you have the right to appeal.

The National Autistic Society allows a period of 10 days from the date of receipt of the outcome letter for an appeal to be submitted. Appeals must be made in writing and addressed to the Director of Assurance & Compliance via email at your.views@nas.org.uk.

Upon receipt of an appeal, the National Autistic Society will acknowledge the request and may seek additional information to support the review process.

All appeals will be reviewed in accordance with Stage 2 of the Complaints Process. A formal response will be provided within 28 calendar days of the appeal being acknowledged. If additional time is required to complete the review you will be notified in writing with an updated timeline.

The National Autistic Society is committed to ensuring that all appeals are managed in a manner that is fair, transparent, and timely.

What happens if I am still unhappy?

In the event that you are unhappy with our Stage 2 response, you have the right to raise your concerns with the Local Authority or Health and Social Care Trust responsible for funding the package of support or service provision. Alternatively, you can raise your concerns with the appropriate regulatory body.

If your complaint is about our Diagnostic and Assessment services, we will refer your complaint to the Centre for Effective Dispute Resolution (CEDR), if appropriate and will inform you that we have done this.

Please see Appendix 1 for more information.

Comments and Compliments

Quality of service is an important measure of our effectiveness. Learning from complaints, comments and compliments is a powerful way of helping continuous improvement at our charity and enable us to better deliver to our values and standards.

As well as learning from your complaints we would like to hear about:

For National Autistic Society Schools and Children's Services refer to Complaints Resolution Policy QS-0010.

- Ideas you have on how we might do things better.
- When we do things well.

Your comments and compliments will be passed on to the relevant team or service and we will use them to help improve the way we do things.

You can make your comments and compliments by contacting any member of our staff or you can e-mail: Your.Views@nas.org.uk

Related documents

Ref	Document name
QS-0001	Incident Management Policy
QS-0001-001-0523	Incident Management Procedure
SO-0194	Safeguarding Adults Policy
SO-0188	Safeguarding Children and Young People (Child Protection) Policy
IGP 02	Data Protection Policy
IGPR01	Identification and Verification Procedure for Individual and Third-Party Requests
IGPR02	Authority to Discuss Information with a Nominated Individual

Appendices

Appendix 1 - Regulatory Bodies

Organisation	Contact Details
The Local Government Ombudsman	☎ 0300 061 0614 🌐 www.lgo.org.uk ✉ PO Box 4771, Coventry, CV4 0EH

For National Autistic Society Schools and Children's Services refer to Complaints Resolution Policy QS-0010.

Northern Ireland Ombudsman	 0800 343 424  www.nipso.org.uk  Progressive House, 33 Wellington Pl, Belfast BT1 6HN  nipso@nipso.org.uk
The Scottish Public Services Ombudsman	Tel: 0800 377 7330  www.spsso.org.uk  99 McDonald Rd, Edinburgh, EH7 4NS
Public Services Ombudsman for Wales	 0300 790 0203  www.ombudsman-wales.org.uk  1 Ffordd yr Hen Gae, Pencoed, CF35 5LJ
The Charity Commission England and Wales	 0300 066 9197  www.gov.uk/government/organisations/charity-commission  PO Box 211, Bootle, L20 7YX
The Charity Commission NI Northern Ireland	 028 3832 0220  www.charitycommissionni.org.uk  Marlborough House, Central Way, Craigavon, BT64 1AD
OSCR Scottish Charity Regulator	 01382 220446  www.oscr.org.uk  2nd Floor, Quadrant House, 9 Riverside Drive, Dundee, DD1 4NY  info@oscr.org.uk
Adult and Community Services	
Care Quality Commission (CQC) England	 03000 616161  www.cqc.org.uk  CQC National Correspondence, Citygate Gallowgate, Newcastle upon Tyne, NE1 4PA

	✉ enquiries@cqc.org.uk
Care Inspectorate Scotland	☎ 0345 600 9527 🌐 www.careinspectorate.com ✉ Compass House, 11 Riverside Drive, Dundee, DD1 4NY ✉ enquiries@careinspectorate.gov.scot
Care Inspectorate Wales	☎ 0300 7900 126 🌐 www. https://www.careinspectorate.wales/ ✉ Welsh Government Office, Sarn Mynach, Llandudno Junction, LL31 9RZ ✉ CIW@gov.wales
The Regulation and Quality Improvement Authority (Northern Ireland)	☎ 028 9536 1111 🌐 www.rqia.org.uk ✉ 7th Floor Victoria House, 15-27 Gloucester St, Belfast BT1 4LS ✉ info@rqia.org.uk
For Assessment and Diagnosis	
Centre for Effective Dispute Resolution (CEDR)	Referrals to CEDR will be made by the NAS if appropriate, appeals can be sent to: ✉ Director of Assurance & Compliance, 2nd Floor, Weston House, 42 Curtain Road, London, EC2A 3NH ✉ Your.views@nas.org.uk
For Fundraising	
Fundraising Regulator (England, Wales and Northern Ireland)	☎: 0300 999 3407 🌐 www. https://www.fundraisingregulator.org.uk ✉ Eagle House, 167 City Road, London, EC1V 1AW ✉ admin@fundraisingregulator.org.uk

OCSR Scottish Fundraising Adjudication Panel	☎ 01382 220446 🌐 www.oscr.org.uk ✉ 2nd Floor, Quadrant House, 9 Riverside Drive, Dundee, DD1 4NY ✉ info@oscr.org.uk
For National Autistic Society Lottery	
Independent Betting Adjudication Service	✉ PO Box 62639, London, EC39 3AS 🌐 www.ibas-uk.com Please be advised: <i>Our Primary License holder is Caroline Stevens, CEO of the National Autistic Society</i>
For Data Breaches	
Information Commissioners Office (ICO)	☎ 0303 123 1113 🌐 www.ico.org.uk ✉ Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5A
For our Online Community Forums	
Ofcom	🌐 https://ofcomlive.my.salesforce-sites.com/formentry/OSComplaintsSafetyAndComplaints Please be advised: <i>Ofcom is not able to respond to or adjudicate on individual complaints. However, the information you provide will them monitor whether online services provided by the National Autistic Society are compliant with our online safety obligations Complaints can, for example, be about particular content, or an online service's safety measures.</i>