

# Complaints Policy

## 1. Introduction

The Royal Drawing School (RDS) is committed to conducting activities and business responsibly, with honesty and integrity and to a high standard. However, all organisations face the risk of something going wrong or people behaving in ways which are not appropriate or acceptable. RDS wants to help resolve matters as quickly as possible and put things right where there are complaints from a third party about the conduct, standards and quality of service delivery in relation to RDS or any of its staff, contractors or students. Further, RDS values and encourages any person to speak up and report where there are concerns about actual or suspected wrongdoing or misconduct. It also sets out RDS's zero-tolerance approach to victimisation and retaliation and commitment to take reasonable steps to protect those who make a complaint or who speak up in good faith.

## 2. Scope of the Policy

### 2.1 Who is covered by the Policy?

This Policy applies to all employees, consultants, contractors, agency workers, students ("RDS People") and all activities undertaken by or on behalf of RDS. Where RDS's ability to control or direct Service Providers (self employed consultants) to comply with this Policy is constrained by external factors, all reasonable endeavours will be made to require compliance with this Policy.

### 2.2 Who can place reliance on this Policy?

Any person or entity affected by RDS, including anyone acting for or on their behalf may make a complaint or raise a concern.

### 2.3 What issues can be raised?

This Policy covers:

- a) Complaints relating to a multitude of issues, e.g. poor service, low standards or quality, or attitude of a staff member. The term "complainant" is used to describe someone making the complaint in such circumstances; the complainant will usually have a vested interest in proving his or her case and in the outcome.
- b) Concerns about risk, malpractice or wrongdoing in relation to RDS activities which adversely affects the public interest, RDS people (as defined below) or RDS itself. This includes actual or suspected misconduct, any actual or suspected breaches of the RDS Code of Conduct, Safeguarding Policies and RDS Operating Policies and Policies (including health, safety, environment and social ("HSES") policies, standards and policies) or any actual or suspected breaches of applicable laws and regulations.

- c) Unless it is in the public interest, this Policy does not cover personal complaints or disputes about their own position, circumstances or treatment raised by any RDS employee, agency workers, consultants and contractors (“RDS People”). In such a case they should follow the internal grievance policy as set out in the relevant staff handbook, their engagement letter or contract.

### **3. Our Commitments**

3.1 In this Complaints Policy RDS commits to establish clear procedures for complaints to ensure that:

- reporting a complaint or raising a concern is as easy as possible for both RDS People and third parties;
- the complaint or concern is dealt with promptly, politely and, when appropriate, confidentially;
- the complaint or concern is handled fairly, consistently, and appropriately; and
- lessons are learned from complaints and concerns raised and used to make improvements.

3.2 Protection for individuals raising concerns.

RDS commits to protect all individuals who raise a concern in good faith. In particular, individuals will not suffer detrimental treatment by RDS as a result of raising a genuine concern. RDS will not tolerate any harassment, victimisation or detrimental treatment of an individual (including informal pressures) and will take appropriate action to protect individuals who raise a concern in good faith in accordance with RDS policies and procedures and any applicable law.

3.3 Any threats or retaliation by RDS People will be treated as a serious disciplinary offence which will be dealt with under relevant disciplinary rules and policies. Appropriate action will be taken in respect of any threats or retaliation by other persons connected with RDS, which may include termination of their contract. RDS will also seek to protect third parties connected with the person raising a concern who could suffer retaliation, such as facilitators, colleagues, relatives, and legal entities that the reporting person owns, works for or is otherwise connected with. RDS is committed to complying with the laws in place in the UK to protect persons raising concerns (for example, in the UK, the Public Interest Disclosure Act protects “Workers” of a Company who provide information about certain “Protected Disclosures”).

3.4 Confidentiality

RDS commits to treat all complaints and concerns in confidence and will protect all personal data in accordance with the applicable data protection laws. Every effort will be made not to reveal the identity of the complainant or person raising

a concern to the extent permitted by law. If it is necessary for anyone investigating the complaint or concern to know the individual's identity, this will be discussed with the individual beforehand to the extent permitted by law or regulation. Any person associated with RDS will not take any steps to ascertain the identity of a person raising a concern anonymously under this Policy. Such action will be treated as a serious disciplinary offence.

### **3.5 No waiver of rights and remedies**

RDS will not waive or limit any legal rights or remedies available to any person in relation to the submission of a complaint or concern under this Policy or under any applicable legislation, whether by agreement, policy, term and condition of employment or other mechanism.

### **3.6 Communication and Training**

RDS commits to ensure this Policy and all related policies will be made available to all RDS employees, consultants, students and third party service providers using appropriate communication channels; that all RDS People will receive appropriate training to ensure that they are fully aware of their rights and responsibilities under this Policy; and all RDS managers will be fully briefed as to their role in supporting this Policy and the appropriate action to take in the event of any complaint being made or any concern being raised to them.

### **3.7 Record keeping**

RDS commits to keep adequate and relevant records which may include, but will not be limited to, investigation notes, meeting minutes, letters and emails. The records will be kept in an organised and secure manner in accordance with applicable data protection legislation. Details of the report, the identity of the individual raising the concern, and anyone mentioned in the report will be kept confidential throughout and after the investigation and only shared on a need-to-know basis or as required by law or regulation.

## **4. Roles and Responsibilities**

The Senior Leadership Team and the Board of Trustees of RDS is responsible for approving this Policy.

The RDS Deputy Director is responsible for the implementation of this Policy and its associated policies. The Deputy Director has overall responsibility for overseeing the investigation of all complaints and concerns, unless the concerns relate to the Deputy Director. The Deputy Director shall periodically report to the Board of Trustees on the adequacy and effectiveness of the RDS complaints arrangements including details of the number, nature and status of complaints received.