

REACHING ALL PEOPLE TRUST CIC

Company No. 10349786

COMPLAINTS POLICY & PROCEDURE

Document owner	Reaching All People Trust CIC
Public-facing delivery platform	RAP Academy®
Version	1.0
Effective date	1 September 2026
Review date	September 2027, or earlier where required
Classification	Public
General complaints contact	info@rapacademy.org

Policy status: This controlled v1.0 policy establishes RAP Trust's organisation-wide complaints framework. It is designed to operate alongside the Safeguarding and Child Protection, GDPR & Data Protection, Whistleblowing, Safer Recruitment and Equality, Diversity & Inclusion policies. Data-protection complaints are subject to additional statutory requirements and are expressly routed accordingly.

1. Statement of Commitment

Reaching All People Trust CIC welcomes concerns and complaints as an important source of accountability and organisational learning. People should be able to challenge poor service, inappropriate conduct, unfair decisions or failures in delivery without fear of retaliation. Complaints will be treated seriously, respectfully and proportionately.

2. Purpose

This policy provides a clear and accessible process for receiving, assessing, investigating, resolving and reviewing complaints.

- Make it straightforward to raise dissatisfaction or concern.
- Identify urgent safeguarding, legal or regulatory issues quickly.
- Resolve matters at the earliest appropriate level.
- Provide a fair review where a complainant remains dissatisfied.
- Record themes and use learning to strengthen practice.

3. Scope

The procedure may be used by participants, children and young people, parents or carers, commissioners, professionals, partner organisations, volunteers, contractors and members of the public in relation to RAP Trust services or conduct. Employment grievances and other specialist matters are routed separately where appropriate.

4. Organisational Context

RAP Academy®, RAP Mentors® and associated delivery identities operate within the wider Reaching All People Trust CIC organisational framework. A complaint about activity delivered under one of these identities is a complaint within RAP Trust's organisational complaints framework and should not be redirected merely because a different RAP name appears in the service or material.

5. What is a Complaint?

A complaint is an expression of dissatisfaction about RAP Trust's service, action, omission, decision, conduct or handling of a matter where the person seeks a response, explanation, remedy or review. A person does not need to use the word 'complaint' for the organisation to recognise one.

6. What This Procedure Does Not Replace

The substance of a concern determines the correct route. This procedure does not replace:

- Safeguarding procedures where a child, young person or adult may be at risk.
- Whistleblowing arrangements for qualifying or organisational speaking-up concerns.
- Employment grievance or disciplinary procedures.
- Data-protection complaints and information-rights procedures.
- Police, emergency, statutory or regulatory routes where those are required.

7. Safeguarding Comes First

Where a complaint contains information indicating actual or possible abuse, exploitation, neglect, serious harm or an immediate safeguarding risk, the safeguarding procedure must be activated without waiting for the ordinary complaints process. Complaint handling and safeguarding action may continue in parallel where appropriate, but safeguarding must not be delayed for administrative convenience.

8. Immediate Risk or Alleged Criminal Conduct

Where information suggests immediate danger or potentially serious criminal conduct, RAP Trust should consider the appropriate emergency, police or statutory route. The complaints process must not be used to conduct an internal investigation that could compromise immediate safety, evidence or an external investigation.

9. Who May Make a Complaint

A person may complain about their own experience or, where appropriate, on behalf of another person. Where a complaint is made on behalf of someone else, RAP Trust may need to establish consent, authority or another lawful basis before disclosing confidential information. Safeguarding and children's rights may require a different approach in particular cases.

10. Children and Young People

Children and young people should be able to raise concerns in ways they can understand and use. RAP Trust should not require formal legal language or unnecessarily complex written submissions. Age, maturity, communication needs, safeguarding and the young person's wishes should inform how the complaint is received and progressed.

11. Accessibility and Reasonable Adjustments

RAP Trust will seek to remove avoidable barriers to making a complaint. Reasonable adjustments should be considered for disabled people where required. Communication may also need to respond to literacy, neurodiversity, language, trauma, learning or communication needs. A complaint should not be rejected merely because it is not presented in a preferred format.

12. How to Make a Complaint

Complaints may be made through an available and appropriate RAP Trust contact route. Written complaints can be sent to info@rapacademy.org. A complainant should provide, where possible, what happened, when it happened, who was involved, why they are dissatisfied, any relevant evidence and what they would like RAP Trust to consider. Lack of supporting evidence does not automatically invalidate a complaint.

13. Receiving Complaints Through Other Channels

Staff and representatives should be able to recognise a complaint even when it arrives through another legitimate organisational channel. Where possible, the concern should be recorded and transferred to the appropriate complaints route rather than requiring the person to start again solely because they contacted the wrong individual.

14. Complaints Handling Principles

RAP Trust will seek to handle complaints according to the following principles:

- Listen without becoming defensive.
- Assess risk before routine administration.
- Be fair to the complainant and to anyone complained about.
- Investigate proportionately and without prejudging the outcome.
- Explain decisions in clear language.
- Protect confidentiality while recognising necessary information sharing.
- Use complaints to identify individual and systemic learning.

15. RAISE → LISTEN → ASSESS → RESOLVE → REVIEW → LEARN

The operational framework is: **Raise** - make the concern accessible; **Listen** - understand what the person is saying; **Assess** - identify risk and the correct procedure; **Resolve** - investigate and provide a reasoned response; **Review** - provide appropriate second-stage scrutiny; and **Learn** - use findings to improve practice.

16. Acknowledgement and Communication

Ordinary service complaints should be acknowledged promptly. RAP Trust deliberately does not impose an unverified fixed response promise in this v1.0 policy. The complainant should be told how the matter will be handled and kept appropriately informed if investigation requires additional time. Statutory or contractual timeframes applying to a particular complaint take precedence.

17. Stage 1 — Complaint and Resolution

At Stage 1, an appropriate person will assess the complaint, identify any urgent safeguarding or legal issues, gather relevant information, consider the accounts of those involved and seek to resolve the matter proportionately. Early resolution may be appropriate where the facts are clear and the complainant is satisfied, but serious concerns must not be informally closed merely to achieve speed.

18. Stage 1 Investigation

An investigation should be proportionate to the seriousness and complexity of the complaint. It may include reviewing records, speaking with relevant people, checking policies or commissioning requirements and considering contextual information. The investigator should avoid material conflicts of interest and record the basis for significant conclusions.

19. Stage 1 Outcome

The Stage 1 response should, so far as lawful and appropriate, identify the complaint considered, summarise the conclusion, explain the reasons, identify any remedy or action and explain whether a Stage 2 review is available. Confidentiality, safeguarding, employment and data-protection obligations may restrict information that can be disclosed about another person.

20. Possible Outcomes and Remedies

Depending on the circumstances, an outcome may include:

- An explanation or clarification.
- An apology where appropriate.
- Correction of inaccurate information or administrative error.
- Reconsideration of a decision.
- Service improvement or changed practice.
- Additional supervision, training or management action.
- Referral into safeguarding, disciplinary, contractual or regulatory processes.
- No further action where the complaint is not substantiated, with reasons explained appropriately.

21. Stage 2 — Review

Where the complainant remains dissatisfied with the Stage 1 handling or outcome, they may request a Stage 2 review. The review should be undertaken by an appropriate person who was not materially responsible for the original decision wherever practicable. The purpose is not automatically to repeat the entire investigation but to examine whether the complaint was handled fairly, relevant information was considered, conclusions were reasonably supported and appropriate action was taken.

22. Stage 2 Outcome

The reviewer may uphold, partially uphold or not uphold the complaint or may require further enquiries. The final internal response should explain the review conclusion and any resulting organisational action that can properly be disclosed. Where an appropriate external route exists, the complainant may be informed of it.

23. Complaints About Senior Leaders

A complaint should not be allocated solely to a person whose conduct or decision is materially implicated. Complaints concerning senior leadership, the Designated Safeguarding Lead or governance personnel should be routed to an alternative person with sufficient independence and authority. External referral should be considered where the organisation cannot provide an adequately independent internal route.

24. Complaints About Safeguarding Practice

A complaint about the quality or conduct of safeguarding practice may be considered through this procedure, but any live safeguarding risk must first be managed through safeguarding processes. Where statutory agencies are involved, RAP Trust should avoid complaint-handling activity that could compromise their work.

25. Data Protection Complaints

A complaint that RAP Trust has infringed data-protection law in the way it handled personal information must be recognised as a data-protection complaint and handled consistently with the GDPR & Data Protection Policy and current ICO requirements. RAP Trust must provide a way to complain, acknowledge receipt within 30 days, take appropriate steps to investigate and respond without undue delay, keep the complainant informed without undue delay, and communicate the outcome without undue delay. These statutory requirements apply even where the data-protection issue forms part of a wider complaint.

26. Data Protection Complaints Mixed With Other Issues

Where a complaint contains both service issues and data-protection issues, RAP Trust may manage them within a coordinated process, but the data-protection element must still meet its statutory requirements. If the data-protection element can be concluded earlier, it should not be held back without justification simply because other issues remain under investigation.

27. Whistleblowing and Speaking Up

Where the substance of a complaint concerns wrongdoing in the public interest, unsafe organisational practice, concealment or another whistleblowing matter, RAP Trust should consider the Whistleblowing Policy. A person should not lose appropriate protection merely because they initially called their concern a complaint.

28. Employment Matters

Personal employment grievances should ordinarily use the appropriate employment procedure. Where an employment complaint also raises safeguarding, whistleblowing, discrimination or data-protection issues, those elements should be recognised and routed appropriately rather than artificially treated as a single grievance.

29. Equality and Discrimination Complaints

Complaints alleging discrimination, harassment or victimisation should be assessed against RAP Trust's Equality, Diversity & Inclusion Policy and applicable law. Reasonable adjustments should be made to the complaints process where required. Equality concerns may also overlap with safeguarding, employment or whistleblowing.

30. Confidentiality

Complaint information will be shared only where there is a legitimate need, subject to safeguarding, legal, procedural fairness and regulatory requirements. RAP Trust cannot promise absolute confidentiality where information must be disclosed to protect someone, investigate fairly, comply with law or engage an appropriate authority.

31. Fairness to People Complained About

A complaint is an allegation or expression of dissatisfaction, not proof of wrongdoing. People whose conduct is complained about should be treated fairly and given an appropriate opportunity to provide information where this is necessary and compatible with safeguarding or external investigations.

32. No Retaliation

RAP Trust will not tolerate victimisation, intimidation or detrimental treatment because someone has made or supported a genuine complaint. This does not prevent proportionate action where a person knowingly fabricates allegations or engages in separate unacceptable conduct.

33. Unsubstantiated Complaints

A complainant will not be criticised merely because their complaint cannot be substantiated. The relevant question is whether the concern was raised genuinely and whether available evidence supports the allegation. Lack of proof is not the same as deliberate fabrication.

34. Repeated, Persistent or Unreasonable Behaviour

RAP Trust may manage contact where behaviour becomes abusive, threatening, excessively repetitive or places disproportionate demands on the organisation. Any restrictions should be proportionate, recorded and focused on the behaviour rather than used to silence a legitimate underlying complaint. Safeguarding, discrimination or other substantive issues must still be considered.

35. Complaints Raised on Social Media or Publicly

Public criticism does not automatically replace the complaints process. Where a complaint can be identified, RAP Trust may invite the person to use an appropriate direct route so that relevant information can be considered securely. Confidential participant or staff information should not be debated publicly.

36. Complaints Involving Partners or Commissioners

Where a complaint concerns joint delivery or another organisation's personnel, RAP Trust should clarify responsibility and coordinate appropriately. The complainant should not be unnecessarily passed between organisations. Contractual, commissioning, safeguarding and data-sharing arrangements may determine which organisation leads particular elements.

37. Records and Data Protection

RAP Trust should record complaints sufficiently to demonstrate receipt, assessment, key enquiries, decisions, communication and actions. Records must be accurate, secure, access-controlled and retained only for justified purposes. Complaint information must be handled consistently with the GDPR & Data Protection Policy.

38. Monitoring and Organisational Learning

Complaint themes should be reviewed periodically to identify recurring concerns, service barriers, safeguarding weaknesses, equality issues, communication failures or systemic risks. Where learning is identified, RAP Trust should consider policy revision, training, supervision, service redesign or other corrective action.

39. Governance Oversight

Leadership should receive proportionate information about complaint volumes, themes, serious cases and organisational learning without unnecessary disclosure of personal information. Governance oversight should test whether complaints are being resolved fairly and whether repeated issues indicate deeper organisational risk.

40. Policy Review

This policy will be reviewed at least annually and earlier following significant legal or regulatory change, a serious complaint revealing procedural weakness, safeguarding learning, recurring complaint themes or material changes to RAP Trust's delivery or governance arrangements. The planned annual review date is September 2027.

Document Control

Policy	Complaints Policy & Procedure
Organisation	Reaching All People Trust CIC
Company number	10349786
Version	1.0
Effective date	1 September 2026
Review date	September 2027 or earlier if triggered
Classification	Public
General complaints contact	info@rapacademy.org

Related governance: Safeguarding and Child Protection; GDPR & Data Protection; Whistleblowing; Equality, Diversity & Inclusion; Safer Recruitment; relevant workforce and programme procedures.

Implementation note: No general 5-, 10- or 20-working-day resolution target has been invented for ordinary RAP Trust complaints. Operational service standards may be added once formally approved. Data-protection complaints remain subject to the separate statutory 30-day acknowledgement requirement and without-undue-delay duties.