

Complaints policy (non-participants)

Policy owner	Director of culture and operations
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Applicable to	Non-participants

Section 1: Overview

1.1 Purpose

- 1.1.1 Frontline recognises that there will inevitably be occasions where people are dissatisfied with the service we provide. We are committed to ensuring that people are able to voice their concerns, in order to help us identify where we can take action to rectify the situation and to learn from our mistakes.
- 1.1.2 This policy sets out the principles and procedures to be followed should anyone have a concern falling within the remit of section 1.2. It exists to ensure that the concern is dealt with fairly, transparently and in a timely manner.

1.2 Scope

- 1.2.1 This policy and set of procedures applies to anyone who is not a recent or registered participant on the Frontline programme. The concern or complaint may be about any service provided by Frontline or provided by an organisation with whom Frontline partners. As Frontline is a separate legal entity from those partners our ability to affect their policies and systems will be limited. This means that in most cases complainants who have concerns with



partner organisations will be asked to communicate their complaint to that organisation directly. However, Frontline will still consider all complaints where the complainant feels their experience of Frontline has been impacted by the other organisation.

1.2.2 Recent or registered participants on the Frontline programme should refer to the Frontline programme complaints policy and procedure.

1.2.3 This policy does not relate to matters which are governed by employment legislation or those where the principles of civil contract law would normally apply, e.g. service/supply contracts entered into with Frontline.

1.3 Responsibilities

1.3.1 This policy is owned by the Director of Culture and Operations. They are responsible for ensuring the procedure is understood and followed by all individuals involved in handling a complaint. They are also responsible for making decisions on the consideration of anonymous, third party or late complaints.

1.3.2 Team heads and/or directors are responsible for maintaining a register of all complaints received by their team and notifying Legal & Compliance Manager (LCM) if they reach stage two. The LCM is responsible for maintaining a central register of such complaints. Such records will be used for internal review.

1.3.3 All staff are responsible for reporting complaints received to their team head and/or director and applying the principles and procedures in this policy when involved in any of the stages of resolution.

1.4 Definitions

Complaint	expression of dissatisfaction about Frontline's action or lack of action, or about the standard of service provided by or on behalf of Frontline.
Concern	issue, query or request for clarification.



Conciliation	voluntary and confidential process whereby an independent person tries to help the people in dispute to resolve their problem.
Exceptional circumstances	circumstances in which strict application of the procedures would result in substantial unfairness to the complainant, or the complainant is in some way at risk because of health or disability.
Investigator	independent employee assigned to investigate a complaint
Mediation	voluntary and confidential process whereby an impartial third party helps parties with a dispute to try and reach an agreement.

Section 2: Policy and procedures

2.1 Principles of dealing with complaints

2.1.1 Frontline commits to deal openly, fairly and effectively with any complaint about services, and to offer an appropriate response to anyone raising a concern.

2.1.2 All those involved in the complaints process are expected to act reasonably and fairly towards each other and treat the processes themselves with respect.

2.1.3 The complaints procedure contains the following stages:

Stage one: Informal resolution

Stage two: Formal investigation

Stage three: Review by a review panel in qualifying circumstances

2.1.4 Every possible effort should be made to resolve a complaint informally within the relevant team.

2.1.5 Frontline will review all formal complaints when they are received.

2.1.6 It is important that any complaint is timely. A formal complaint will not as a rule be investigated if a period of three months has elapsed since the alleged action which forms the basis of the



complaint, although the LCM may allow such a complaint to proceed at their discretion in exceptional circumstances.

- 2.1.7 Frontline will seek to complete stages two and three within 90 calendar days of receiving the formal complaint. However, there will occasionally be circumstances when this timeframe will need to be extended, and this will be communicated as early as possible.
- 2.1.8 At any point during the complaints process, either party may make a request for mediation or conciliation. Where both parties agree to this approach during stage two, revised timescales will also be agreed.
- 2.1.9 When making a complaint, the complainant is encouraged to set out the steps or actions that they consider would remedy the situation.
- 2.1.10 Frontline will not consider unsubstantiated complaints that it regards as vexatious or malicious.
- 2.1.11 Frontline does not as a rule deal with anonymous complaints or complaints from third parties who are not representing the person(s) affected, although it will consider the circumstances of any such submission and may, in exceptional circumstances, take the complaint forward. Where such complaints are received it will be at the discretion of the LCM, in consultation with the relevant team head or other senior staff members, to determine whether the complaint will be considered. Complainants should note that raising a concern anonymously may impede the investigation and communication of the outcome.
- 2.1.12 Confidentiality will be respected throughout the complaints process and data protection legislation will be complied with, including when the process necessarily involves making enquiries of an outside organisation. Information pertaining to the complaint will only be released to those who need it for the purposes of investigating or responding to the complaint.

2.2 Stage one: informal resolution

- 2.2.1 Frontline encourages all individuals to seek to resolve their complaint informally prior to making a formal complaint where appropriate, with the expectation that some complaints could be satisfactorily resolved at this level. As per 2.3.1 below, Frontline acknowledges that some



complex or serious complaints will need to progress directly to stage two.

- 2.2.2 The complainant should seek to discuss their complaint with the person to whom the complaint relates or who is responsible for the matter that gives rise to the complaint. They should make it clear that they have a complaint and outline what they consider would remedy the situation in order to assist with finding a suitable resolution. If they are uncertain who the best person to raise their complaint with is, they should email complaints@thefrontline.org.uk.
- 2.2.3 It may be possible for the complaint to be fully addressed and resolved through a meeting between the parties concerned. Alternatively, further enquiries may be required.
- 2.2.4 Should at any point in the procedure an informal resolution be proposed and accepted by all parties, the formal procedure does not need to continue.
- 2.2.5 Where there are clear procedures for the resolution of an issue such as recruitment, placement of applicants, deferrals etc and there is clear evidence that those policies have been followed without bias, in accordance with the established process, there will be no appeal of the decision.

2.3 Stage two: formal investigation of written complaint

- 2.3.1 A complaint will proceed to stage two where;
- 2.2.5 above does not apply and
 - the complainant is not satisfied with the outcome of stage one; or
 - the complainant can provide good reason why stage one cannot be conducted due to the character, complexity or seriousness of the case.
- 2.3.2 The stage two procedure is designed to enable the complaint to be resolved to the satisfaction of all parties through a formal investigation.

Issuing the complaint

- 2.3.3 The complaint must be raised by sending a completed complaint form to complaints@thefrontline.org.uk. The complaint form is available on Frontline's website.



- 2.3.4 An individual making a complaint may be supported and advised by a third party throughout the process.
- 2.3.5 In exceptional cases the complainant may also choose to be represented by a third party who acts on their behalf. Frontline will require written consent from the individual making the complaint and will then communicate with the third party going forward.
- 2.3.6 A group of people affected by the same set of circumstances may want to make a group complaint. In such circumstances the group should nominate a single representative to liaise with Frontline. Each member of the group should provide their names and contact details in the initial submission.

Receipt of written complaint

- 2.3.7 On receipt of the complaint the LCM, or designated alternate nominated by the COO, will review the complaint and will determine, in collaboration with relevant parties, whether it is appropriate for the complaint to be considered under this policy and whether the nature of the complaint warrants its consideration under other procedures.
- 2.3.8 The LCM will inform the complainant in writing of the decision and the next steps to be taken. This will include details of what to do if the complainant does not agree with the decision.

Investigation of complaint

- 2.3.9 Where the LCM finds it is appropriate for the complaint to be considered under Frontline's non-participant complaints policy, they will assign an investigator (a staff member at the appropriate level or an external professional, with no prior direct involvement in the matter), to investigate the complaint.
- 2.3.10 As part of the investigation, it may be necessary for the investigator to conduct a meeting with the complainant and/or the persons subject to the complaint and/or any witnesses. Minutes of the



meeting will be taken and the complainant and persons subject to the complaint will have the right to be accompanied by their adviser or represented by their representative if they have one.

2.3.11 Where the circumstances of the case require, all the evidence collated by the investigator will be submitted to a decision maker who will assess the facts and take a decision on the outcome of the complaint. The decision maker may determine that further lines of enquiry are needed before they can take a decision, in which case they will issue instructions for further steps to be taken by the investigator.

2.3.12 The LCM will project manage and advise on the process of the investigation as required.

2.3.13 The burden of proof is on the complainant, albeit within a recognition of the responsibilities of Frontline.

Outcome of complaint

2.3.14 On completion of the investigation the LCM will then respond to the complainant and inform them of the outcome of the investigation.

2.3.15 The investigation outcome may provide remedy such as deemed appropriate and fair in relation to the complainant, subject to the following parameters:

- Review of a policy or process-related decision (but not an automatic change of a policy or decision);
- Referral to relevant human resource procedures (but not changes to a staff member's contract).

2.4 Stage three: review by a review panel

2.4.1 Complainants will be entitled to seek a review by a complaints review panel when they are dissatisfied with the outcome of the formal stage and:

- there exists evidence of a material procedural irregularity in the consideration; and/or
- there exists evidence that could not reasonably have been made available for the formal investigation; and/or
- there exists evidence that the judgement was not a judgement that could have been reached by a reasonable person in receipt of the materials formally considered. For example this could



include if the investigation did not consider all relevant issues or information available.

- 2.4.2 The review stage will not usually consider the issues afresh or involve a further investigation or consider a new complaint.

Issuing the request

- 2.4.3 A complaint at stage three is initiated by the complainant submitting a request in writing to complaints@thefrontline.org.uk, within ten working days of having received the outcome of the investigation at stage two. A request made after this date will not as a rule be considered, although the LCM may allow such a complaint to proceed at their discretion in exceptional circumstances.
- 2.4.4 The request should include full details of the complaint, action taken to resolve the complaint at previous stages, why the complainant remains dissatisfied, the reason for their request for review (as per 2.4.1) and the steps or actions that they consider would remedy the situation.
- 2.4.5 Where additional information is introduced at this stage, the complainant will need to detail the circumstances that prevented its earlier disclosure.
- 2.4.6 Where the review is requested on the basis of the judgement not being that of a reasonable person, the complainant will need to provide evidence in support of this.

Receipt of a request

- 2.4.7 The Director of Operations and Culture will determine whether the request is eligible for review.
- 2.4.8 The LCM will acknowledge the request for a review by the review panel and inform the complainant whether it has been determined that a review should take place.
- 2.4.9 If relevant, the LCM will subsequently send a letter to the complainant confirming the date of the review panel hearing and details of what is involved and required.



Frontline review panel hearing

- 2.4.10** The complainant and the decision maker are both expected to attend the review panel hearing but will not be required in the hearing at the same time. Non-attendance by either party will result in the hearing continuing in their absence, based only on the documentation submitted as per 2.4.13.
- 2.4.11** A clerk will be assigned to act provide administrative support to the panel.
- 2.4.12** The review panel will consist of at least two senior members who are independent to the complaint and have not been involved in the earlier stages.
- 2.4.13** The documentation submitted to the review panel will consist of:
- the request for a stage three review from the complainant;
 - a report from the stage two investigator on the process and findings of their investigation;
 - the documentation considered during the stage two investigation;
 - the outcome of the complaint
 - evidence supporting the criteria (from 2.4.1) under which the review is being held.
- 2.4.13** If the review panel has been convened on the basis that evidence exists that could not reasonably have been made available during the formal investigation, then relevant witness statements may also be submitted with the documentation to the review panel.
- 2.4.14** Complainants and staff members required to attend the hearing of the review panel can be accompanied by another individual as specified in 2.3.4.
- 2.4.15** It is the responsibility of the complainant and decision maker to ensure that any witnesses whom they wish to call to support their view of the complaint are available for the meeting of the review panel and briefed on the arrangements. A complete list of witnesses called to attend the hearing must be provided to the review panel no less than ten working days before the hearing. The review panel reserves a right to request the attendance of any witnesses not on this list who it believes is critical to its understanding of the facts and issues raised in the complaint. Where the review panel chooses so to do, it shall inform the complainant and the decision maker of this.
- 2.4.16** All documentation, including each party's list of witnesses must be submitted by the complainant



and decision maker to the clerk to the panel no less than ten working days before the meeting of the review panel.

2.4.17 Papers will be circulated to review panel members, the complainant, and the decision maker at least five working days before the meeting date.

Outcome of the review panel hearing

2.4.18 Following the hearing the review panel will make its decision. The LCM will send the complainant a letter outlining the review panel's decision.

2.4.19 The decision of the review panel will be final and bring Frontline's consideration of the complaint to a close.