

Complaint Handling Procedure

This procedure should be read alongside, and practiced in accordance with, the Horncastle Theatre Company Code of Conduct and Privacy Policy.

1. Receipt of complaint; acknowledgement; suspensions

A complaint is formally opened **when the Complainant/s submits a written request to open a formal complaint, naming the subject, to a member of the Committee or the Membership Secretary.**

A complaint is considered *received* at this point and shall not be refused, blocked, or delayed based on insufficient detail. There should be no substantive discussion of the complaint at this stage beyond acknowledgement and any clarification strictly necessary to avoid potential conflicts of interest in handling the complaint, and determine whether interim measures (such as suspension) may be necessary. Direct communication between the Subject/s and Complainant should be avoided unless necessary and appropriate. The Subject/s of the complaint may be notified of the existence of the complaint, but no further detail provided at this point where doing so could:

- compromise evidence
- create pressure on the complainant
- undermine fairness.

If the Complaint is considered sufficiently serious, and it is considered absolutely necessary to protect the Charity, volunteers or the general public from immediate risk, suspension of membership may be appropriate while the matter is investigated, limiting the Subject/s' participation in HTC events. Such measures are precautionary only and do not imply guilt.

Although it is expected that Complainants will have exhausted all informal routes before submitting a formal complaint, this shall not be sufficient grounds on which to refuse a formal complaint if the Complainant feels informal resolution is impossible or inappropriate. All Complaints should be handled confidentially on a strictly 'need to know' basis, until a decision is reached, to protect the integrity and fairness of the investigation.



2. Appointment of Independent Decision Maker and Protected Disclosure

The Independent Decision Maker/s must be appointed within a reasonable time of receiving the complaint. Subject/s and Complainant/s may object to the appointment **only on reasonable grounds**, such as:

- prior involvement in the matter
- close personal relationship with either party
- clear bias or conflict of interest

They may not object simply because:

- they dislike the person
- they believe the person may not agree with them

- they want to delay or control the process

If no objection is raised within a specified timeframe, or if any objections are not upheld, the appointment will stand. The Complainant should submit a summary of their complaint, and any relevant evidence, directly to the Decision Maker/s once confirmed.

The Decision Maker/s should be appointed based on appropriate seniority or experience; ability to act impartially; absence of conflict of interest. The Decision Maker/s may be a member of the Management Committee, another member, or an external individual.



3. Investigation Stage

The Decision Maker/s should invite the Complainant to meet to explain their complaint, provide relevant background, and answer any clarifying questions. The Decision Maker/s may meet with anyone else they feel is relevant to establish the facts of the Complaint. The Decision Maker/s must also invite the Subject/s to meet to provide their perspective, answer clarifying questions, and ensure there is a fair right of reply to the Complaint. The Decision Maker/s will determine the order and format of meetings in a way that ensures fairness to both parties. The Subject/s must be provided with sufficient detail of the complaint in advance of any meeting to allow a fair opportunity to respond, except where strictly necessary to preserve the integrity of the investigation.



6. Decision Stage

Once the Decision Maker/s are satisfied they have all the information they require to make a decision based on the balance of probabilities, they should decide whether to uphold, partially uphold, or not uphold the Complaint. The outcome must be recorded in writing, including the reasons for the decision, and provided to both parties within a reasonable timeframe.

The Decision Maker/s should also make recommendations to the Management Committee as to how to resolve the Complaint, regardless of outcome, including but not limited to: mediation; oral warning; first written warning; final written warning; or, as a last resort, where all other options have been exhausted, immediate termination of membership of Horncastle Theatre Company.



7. Appeal Stage

Either party may submit a written appeal against the outcome within ten working days. Appeals are not an opportunity to re-hear the Complaint but should consider whether there has been any procedural error; new evidence not available to the original Decision Maker/s; and fairness/proportionality of the outcome.

Any review will be conducted by new independent Decision Maker/s (as determined under the criteria above) not previously involved in the matter. The outcome of the Appeal shall be final and there shall be no further right of appeal after this stage.

Date adopted: 26/06/2026