

Catch22 policy

Complaints, Compliments & Feedback

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Catch22 reserves the right to amend this policy, following consultation, where appropriate.

Policy Owner:	<i>Director of Governance</i>
Queries to:	<i>Feedback@catch-22.org.uk</i>
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Catch22 group, entity, hub:	<i>Catch22</i>

Document Version Control & Changes

Version	Last modified	By	Changes Made
1.0	16/06/2023	Nick Thatcher, Head of Governance & Risk	Policy reviewed and refreshed. No substantial changes made.
1.1	12/05/2024	Nick Thatcher, Director of Governance, Risk & Compliance	Further detail provided on the page 10.
1.2	14/07/2025	Jamie Wright, Risk Assurance Project Coordinator	Policy reviewed. Updated appendices and local feedback logs.
1.3	23/07/2026	Nick Thatcher, Director of Governance	Content review and refresh. Tone and language adjustments. No procedural amends.
2.0	07/09/2026	Jamie Wright, Risk and Governance Officer	Amended review dates and remove prison appendix but added a section instead.

1. Summary

This policy:

- safeguards the rights of individuals using our services, and ensures we improve services by learning from our errors and successes
- covers people who receive our services, people (other than our own staff) involved in the care or welfare of our service users, and any other organisation or individual on whom our services impact
- looks at making a complaint, the three complaint stages (local/informal complaint resolution, organisational/formal complaint resolution and panel hearing/appeals), in what circumstances we might suspend or not apply this policy, and related policies.

2. What is the policy about?

We encourage and support people to share complaints, comments and compliments about our services. A complaint is any expression of dissatisfaction with our services and a request for us to put things right. Comments and compliments are also valuable because they help identify opportunities to improve services and recognise good practice. This policy protects the rights

of people using our services and supports service improvement by helping us learn from both mistakes and successes.

3. Who is the policy for?

This policy applies to:

- people who use our services
- non-employee workers involved in the care or welfare of service users*
*This includes sessional workers, volunteers, agency staff and contractors. These individuals are not employees and are therefore not covered by the Grievance Policy.
- any organisation or individual affected by our services.

Complaints from employees are handled under the relevant internal policies, such as the Grievance Policy. See section 13. Complaints about prison-based services are handled under the Prison Procedure at section 12. Complaints relating to IR35 are covered in Appendix A.

4. Policy statement

We are committed to:

- improving outcomes for the people we work with, in partnership with their families, carers, communities and other organisations
- providing high-quality services for everyone we support
- learning from mistakes and continually improving what we do

How we handle complaints and comments is central to this commitment. We aim to respond to concerns positively and decisively by:

- treating anyone who makes a complaint, comment or compliment with respect
- supporting people to make complaints and keeping them informed throughout the process
- handling complaints as quickly as possible while maintaining confidentiality wherever we can
- training staff to apply this policy
- encouraging managers to resolve complaints locally and informally where appropriate, in discussion with the complainant
- treating staff named in complaints fairly and in line with our employment policies
- reviewing this policy and monitoring the volume, nature and themes of complaints, comments and compliments.

5. Making a complaint

We make everyone we work with aware of this policy and explain how they can make a complaint, comment or compliment. They can do this using a freepost form, email, letter or the online form on our website.

Where possible, complainants should put their complaint in writing. If this would create a barrier, we can accept a verbal complaint. The complaint should then be written up and sent to the complainant to confirm that it accurately records the issue(s) they want addressed.

Complaints can also be sent to the dedicated complaints email address: feedback@catch-22.org.uk. This inbox is monitored daily, excluding weekends and bank holidays.

Complaints made through social media will not be answered on an open platform. They must be escalated through line management and to the relevant SLT member, who will ensure the Communications team is informed. These complaints will be treated as organisational/national complaints because of the potential reputational risk. Staff must not engage in public discussion or debate and should invite the complainant to contact us directly by email at feedback@catch-22.org.uk or by post.

Except for complaints raised through social media, we will usually respond using the same method used by the complainant:

- Email – response by email, without an attached letter
- Letter – response by letter
- Feedback form – response using the method requested on the form
- Website form – response by email, unless another method is requested

Note: If a letter is sent by email, it must be provided in a non-editable format, such as PDF, to reduce the risk of misuse of Catch22 branding or paperwork.

Complaints should be made as soon as possible, and no later than three months after the incident. We may extend this limit if:

- the complaint could not reasonably have been made earlier; and
- we are still able to investigate the facts.
- We will not investigate complaints about events that took place more than one year before the complaint was received.

If someone we work with wants to complain about another organisation's services, we will support them to use that organisation's complaints procedure.

Catch22 recognises that, in some circumstances, complaints may need to follow alternative routes depending on their nature or how they are raised. Prison-based complaints are covered in Appendix A. Schools should use the School Complaints Procedure in the Educational Complaints and Compliments Policy. Supplier CEST concerns are covered in Appendix B.

Each service must keep a local log of complaints and outcomes and review it at team meetings. The log may be inspected by the relevant director, the Chief Officers Group and, where contractually agreed, commissioners or other third parties.

6. Categorisation of complaints

Under this policy, complaints are categorised into three stages:

- Stage one – local/informal complaints
- Stage two – organisational/formal complaints
- Stage three – appeals

The following criteria should be used to determine the appropriate stage for a complaint:

Stage one: local/informal complaints will usually:

- be made verbally or in writing;
- not allege a serious breach of policy or standards;
- not have been raised on social media; and
- be capable of being resolved by the local service.

Examples of locally managed informal complaints include a worker not informing a service user about an appointment change; a breakdown in the working relationship between a service user and worker that can be resolved through local intervention, mediation or a change of worker; or neighbour complaints about noise or nuisance that have not involved the police or local authority.

These complaints must be handled by the local responsible manager and recorded on the service complaints log.

The local responsible manager must:

- tell the complainant when they can expect a response, usually within seven working days
- where the matter can be resolved locally, provide a considered response based on the circumstances and explain the complainant's options if they remain dissatisfied.

If the complainant remains dissatisfied and wants to escalate the matter, the complaint should be referred through the relevant line management route to the appropriate SLT member. Relevant documentation should be attached so it can be reviewed and, if necessary, investigated further as a stage two organisational/formal complaint.

Stage two: organisational/formal complaints will usually:

- be made in writing, including verbal complaints that have been written up and agreed with the complainant as an accurate record; and/or
- allege a serious breach of policy or standards, including but not limited to:
 - recruitment and selection
 - safeguarding
 - health and safety

- operational malpractice.

and/or

- have been raised on social media, due to the potential reputational risk; and/or
- have escalated from a local/informal complaint because the complainant remains dissatisfied or the issue is unresolved; and/or
- involve an MP, regulator, local authority, media organisation or other external body, or otherwise indicate potential reputational impact.

Stage three: appeals

If the complainant is dissatisfied with the outcome of the stage two organisational/formal complaint process, they may appeal in writing within 28 days of receiving the response. The appeal must explain why they are dissatisfied with the outcome.

An appeals panel will be formed and will include:

- a relevant hub director who has not previously been involved in the complaint, which may include the commissioning director if they delegated the initial complaint management
- a Chief Officer, where the sensitivity of the complaint requires it
- an independent person from an unrelated part of the business at Head of level or above. In exceptional circumstances, an external person may be invited to join the panel. This decision will be made by a nominated COG member or relevant director, for example where a local authority commissioner or other relevant person should be involved because the complaint relates to delivery of a statutory service such as leaving care.

The panel will review the available information and carry out any further investigation it considers necessary, which may include speaking with the complainant. The panel may recommend mediation if it believes this could resolve the dispute. The panel must write to the complainant within seven days of the panel meeting, setting out its findings.

The panel must consider the appeal on the balance of probabilities and decide whether the original investigation overlooked any issues or did not fully examine the facts. The panel may make one of three decisions:

- uphold the appeal and overturn the original outcome
- partially uphold the appeal and partially overturn the original outcome
- not uphold the appeal and confirm the original findings.

In some services, such as social care, a complainant who remains dissatisfied may refer the matter to the local authority or an external ombudsman for further review.

If you are unsure how to categorise or manage a complaint, contact the Feedback mailbox for advice.

7. Roles and responsibilities

7.1 Complaint Administrator

The Complaint Administrator will:

- monitor the complaint mailbox and notify relevant Business Directors of complaints received centrally
- provide basic procedural advice, including response timescales
- act as the first point of contact for organisational complaints
- record and manage all complaints made centrally.

7.2 Commissioning Manager

The Commissioning Manager will:

- be the relevant Director for the area to which the complaint relates, or delegate this responsibility to another Senior Manager within their hub where appropriate
- appoint an Investigating Officer where the complaint is complex or involves several people, and notify the Complaint Administrator of the appointment
- agree the investigation terms of reference
- work with the Investigating Officer to prepare the complaint response.

7.3 Investigating Officer

The Investigating Officer will:

- be a manager from the same hub who has not been involved in the matters complained about
- carry out the investigation
- where necessary, meet with the complainant and other relevant people, including witnesses, to gather evidence and establish the facts
- prepare an investigation report and discuss the findings with the relevant Director or delegated authority
- ensure the Director or delegated authority provides the Complaint Administrator with an analysis of the cause of the complaint and any action taken or recommended.

8. Process

8.1 Acknowledgement

The Complaint Administrator will usually acknowledge an organisational/formal complaint within one working day of receipt, and no later than three working days. The acknowledgement will explain the next steps and when the complainant can expect a further response, normally within 28 days. If more time is needed, the Complaint Administrator or relevant business leader will write to the complainant, explain the reason for the delay and provide an expected completion date.

8.2 Investigation

Terms of Reference - The Commissioning Manager will agree the investigation terms of reference, setting out the investigation's objectives and scope. The terms of reference must enable the investigator to decide whether each allegation is:

- upheld
- partly upheld
- not upheld.

Investigation Report - The investigation report will set out the evidence and determine whether the complaint identifies a breach of policy or standards, negligence, misconduct or deliberate wrongdoing by one or more individuals.

Templates can be found [here](#)

8.3 Response

When the investigation is complete, the Director or delegated authority will undertake or approve the response to the complainant. The response will confirm whether the complaint has been upheld, partly upheld or not upheld. Information may be restricted where required for confidentiality or data protection reasons, for example where a staff member is subject to disciplinary action. The response will be copied to the:

- complainant's advocate, where applicable
- service/project manager and/or assistant director or head of service
- Feedback inbox.

Not all complaints require a formal investigation. Where the issue can be resolved using readily available evidence or information, it should be closed as quickly as appropriate. A formal investigation must be carried out where there has been a serious breach of policy or standards, or where disciplinary action may follow if the allegation is upheld.

9. Suspension/non-application of procedure

A complaint will not be considered, or will not be considered further, under this procedure where the substance of the complaint:

- has been withdrawn by the complainant, unless Catch22 decides there is a reason to continue, for example to identify lessons learned
- repeats a complaint that has already been considered under this procedure
- is being, or has already been, investigated by an independent body or under the relevant commissioner's arrangements
- remains unclear after Catch22 has asked the complainant for clarification
- may damage the interests or wellbeing of a child or vulnerable person if handled through this procedure

- asks Catch22 to provide an outcome it has no power to grant, in which case the complainant will be directed to the organisation or agency able to make the relevant decision
- is considered unreasonable, persistent or frivolous, including where a complaint has been pursued repeatedly despite investigation finding no substantive basis, or where there is reason to believe it has not been made in good faith or forms part of harassment against individual workers. Before this ground is applied, the Deputy Chief Executive Officer, or equivalent grade, must review the complaint history and responses to confirm that all issues have been addressed.
- relates to events that took place more than one year before Catch22 received the complaint
- is about a matter where the complainant has confirmed in writing that they are taking, or intend to take, court or tribunal proceedings
- is subject to an investigation being carried out in contemplation of criminal proceedings; or
- relates to criminal proceedings that Catch22 has been notified are pending.

The Deputy Chief Executive Officer and Chief People Officer will jointly decide whether this procedure should be suspended or disapplied for any of these reasons. The complainant, and the relevant commissioner where appropriate, will be informed.

10. Local complaints monitoring and management accountability

Operational Directors, Assistant Directors and Heads of Service are responsible for reviewing service complaints logs annually to ensure they are maintained, used to track complaint resolution and support organisational learning. Service Managers must ensure that complaints, comments and compliments are discussed in team meetings so staff can contribute to service improvement and share learning.

Each service will have a designated Feedback Champion responsible for keeping the local Feedback Log up to date when complaints are received and ensuring all relevant information is recorded accurately. Feedback Champions should highlight significant issues or emerging trends to the central Feedback Team so appropriate support or investigation can be provided. They must also escalate unresolved complaints that need to progress to Stage 2 organisational/formal complaint handling.

Templates for local complaint and compliment logs can be found [here](#). Feedback Champions will be given access to the relevant service logs in the central storage location.

11. Compliments and other feedback

Catch22 welcomes compliments and other feedback on the services we provide and the people who work for us. These can be recorded locally or sent through to the feedback@catch-22.org.uk for central recording. All positive feedback must be acknowledged within 3 working

days and, where it relates to an individual, the content should be shared with that person at the earliest opportunity.

Suggestions for improvement not relating to a complaint must also be acknowledged and manager should reflect in their response the consideration they have given or will give to the suggestion. If appropriate, the response should include a brief outline of changes made, to be made or why the change cannot be actioned as appropriate.

12. Prison Based Services Complaints

For complaints pertaining to Prison Based Services, these are subject to the requirements of the HM Prison and Probation Service (HMPPS) Complaints Policy Framework and will be handled in accordance with the relevant procedures and standards set out within that framework.

Where complaints relate specifically to the conduct or behaviour of Catch22 staff, or the quality of services provided by Catch22, these should also be reported and managed in line with the Catch22 Complaints Policy and associated procedures, in addition to any reporting requirements under the HMPPS Complaints Policy Framework. This approach supports a fair, transparent and consistent process for the consideration and resolution of complaints arising within prison settings.

13. Related policies & documents

The following policies and documents may need to be read alongside this policy in certain circumstances and are relevant to it. All these documents can be found in 4policies.

- Whistle-blowing policy
- Safeguarding policy
- Grievance policy
- Disciplinary policy
- [Good Complaints Handling – A guide for services](#)
- Data Protection policies
- Code of Conduct policy

Appendix A

IR35 CEST Disagreement Procedure

Under the IR35 regulation suppliers can, if they wish, appeal any engagement outcome as a result of a completed CEST. Below set outs Catch22's procedural expectation.

How to raise a concern?

A supplier can raise a concern both verbally and/or in writing. They must however do the following -

Verbally

To do so verbally a concern must be made to the relevant lead administrator responsible in the first instance for completing and sharing the Status Determination Statement. It will then be shared through to the purchasing team for review.

In Writing

To raise a concern in writing a supplier must use the feedback@catch-22.org.uk mailbox detailing their concern, specifying on what grounds they wish to appeal their outcome.

What happens next?

Any disagreements received will be reviewed and managed by the CEST Decision Panel (CDP), with input from the relevant Administrator. The membership of the CDP will comprise of Catch22's Chief Finance Officer (CFO), Head of Financial Management, Processing Team Leader and has the responsibility for considering the points of any concern made and make a decision as a result.

The Response

A response will be made within **45 calendar days**, beginning with the day the representations are received, not from when the SDS was issued. The response will inform the supplier that the original SDS have been either unchanged or considered incorrect and will provide a new SDS with the date this new SDS became applicable and state that the previous SDS is withdrawn.

All concerns will be recorded centrally through the complaints log.

Annex 1: Equality Impact Assessment

Catch22 is committed to always: avoiding the potential for unlawful discrimination, harassment and victimisation; advancing equality of opportunity between people who share a protected characteristic and those who do not; and, foster good relations between people who share a protected characteristic and those who do not.

An Equality Impact Assessment (EIA) is a tool for identifying whether or not strategies, projects, services, guidance, practices or policies have an adverse or positive impact on a particular group of people or equality group. While currently only public bodies are legally required to complete EIA's, Catch22 has adopted the process in line with its commitment to continually improve our equality performance.

1. Summary

This EIA is for:	Complaints Compliments & Feedback
EIA completed by:	Director of Governance
Date of assessment:	July 2026
Assessment approved by:	n/a

Objectives and intended outcomes
This EIA has been completed in order to ensure that the implications and potential impact, positive and negative, of the Catch22 Complaints, Compliments & Feedback policy for all staff have been fully considered and addressed, whether or not the staff members share a protected characteristic.

2. Potential Impacts, positive and negative

Equality Area	Positive	Neutral	Negative	Summary
Age	☐	☒	☐	The policy applies equally to all members of staff regardless of age. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of their age.
Disability	☐	☒	☐	The policy applies equally to all members of staff regardless of health/disability. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of their disability.
Gender Re-assignment	☐	☒	☐	The policy applies equally to all members of staff regardless of their gender at any given time. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of gender.
Marriage and Civil Partnership	☐	☒	☐	The policy applies equally to all members of staff regardless of their marriage or civil partnership status. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of their marriage or civil partnership status.
Pregnancy & Maternity/paternity	☐	☒	☐	It's not considered that the policy positive or negatively impacts on pregnant women or on staff on maternity or paternity leave.
Race (incl. origin, colour and nationality)	☐	☒	☐	The policy applies equally to all members of staff regardless of their race, origin, colour or nationality. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively in these respects.
Religion or Belief	☐	☒	☐	The policy applies equally to all members of staff regardless of their religion or belief. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member

				of staff because of their religion or belief.
Sex	☐	☒	☐	The policy applies equally to all members of staff regardless of their sex. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of their sex.
Sexual orientation	☐	☒	☐	The policy applies equally to all members of staff regardless of their sexual orientation. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of their sexual orientation.

3. Negative impacts and mitigations

Negative Impact	Mitigation	Owner