

**National Portrait Gallery**

**Complaints Policy**

**1. Policy Statement**

- 1.1 The National Portrait Gallery is committed to providing a quality engagement with service to its stakeholders and explores all opportunities to review its standards, including feedback from stakeholders in the form of complaints.
- 1.2 The aim of this policy is, where possible, to resolve any problems swiftly and to identify areas where the Gallery may improve its engagement with Stakeholders. The Gallery will investigate and try to resolve every complaint in a positive manner and will treat complaints as an opportunity to improve the services the Gallery provides to the public. The final stage of this policy is a review of a complaint by the Executive Leadership Team (Director's Group). This policy does not include an appeal procedure, however complaints may be referred to the Board of Trustees for an internal review of how a complaint has been handled. It will be at the Board's discretion to determine a different outcome if it would be fair to all stakeholders.

**2. Policy Scope**

- 2.1 Definition: a complaint may be defined as an expression of dissatisfaction about any aspect of the Gallery's service, offer or operation, or regarding an action or perceived failure on the part of the Gallery.
- 2.2 This policy covers all complaints about any engagement with the Gallery or provision of services or facilities provided by the Gallery, which could include matters relating to:
  - Health and safety
  - Interpretation/Display
  - Estates and facilities
  - Gallery policy
  - Behaviour of Gallery staff
  - Unfair treatment
  - Contravention of laws or regulations
- 2.3 The scope of this policy does not include complaints which are dealt with under other procedures listed below:
  - Whistleblowing – refer to the Gallery's Whistleblowing Policy
  - Employee complaints or any matter governed by employment law
  - Complaints about services provided by other providers who may use the Gallery's premises or facilities – these should be referred directly to those providers who will have their own complaints procedures
  - Complaints or internal reviews relating to data protection or the Freedom of Information Act

**3. Responsibilities**

- 3.1 The implementation and monitoring of this policy will be the responsibility of the Director's Group and the Board of Trustees. The Audit and Risk Committee will receive an annual report on any complaints received by the Gallery.
- 3.2 All staff are responsible for implementing the policy and following the relevant procedures.

**4. Principles of this Policy**

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## Policies and Procedures

- 4.1 The Gallery will seek to ensure that all complaints are managed as quickly and as effectively as possible and in a manner which respects confidentiality. Complaints are shared with the relevant teams and third parties as required to allow us to complete a thorough investigation, and to give the teams the opportunity to respond.
- 4.2 Complaints should be made in writing where possible via the Gallery's Contact Centre; this provides a clear audit trail and ensures that the scope of the complaint is fully understood. To enable the Gallery to deal with a complaint we may first need to ask you to provide additional information or clarification and we may need to collect information or obtain this from other parties.
- 4.3 Complaints must be made no more than twelve months after the grounds upon which a complaint is based first arose (this period may be extended for good reason at the discretion of the Director).
- 4.4 The Gallery endeavours to respond to all complaints where contact details are given and responses requested. We aim to provide an acknowledgement and first response to a comment within five working days of receipt, and a full response within twenty working days of all required information being available (if the Gallery needs longer to provide a full response, a member of Gallery staff will contact the correspondent to advise when a reply can be expected).
- 4.5 The Gallery will seek to determine an effective outcome of a complaint with appropriate redress where necessary. Outcomes of the complaint could include:
  - An explanation
  - An acceptance that the situation could have been handled differently or better
  - An assurance that the Gallery will try to ensure the event complained of will not recur
  - An explanation of the steps that have been or will be taken to help ensure that it will not happen again and an indication of the timescales within which any changes will be made
  - An undertaking to review Gallery policies in light of the complaint
  - An apology
- 4.6 In the case of an anonymous complaint, it will be in the Gallery's discretion whether to investigate the complaint.
- 4.7 If a correspondent wishes to withdraw their complaint, the Gallery will record this in writing.
- 4.8 In accordance with the Equality Act the Gallery will make reasonable adjustments if required to enable correspondents to access and complete this complaints procedure. For instance, providing information in alternative formats, assisting correspondents in raising a formal complaint or holding meetings in accessible locations.

## 5. Complaints Procedure

### Informal Complaints

- 5.1 The National Portrait Gallery values all feedback and takes complaints very seriously. Members of the public are encouraged to contact the Gallery with any complaints, suggestions or praise.
- 5.2 Contact may be made by:
  - email, using the Email Enquiries form at [www.npg.org.uk/about/contactus](http://www.npg.org.uk/about/contactus);
  - by telephone by calling our Contact Centre on +44 (0)20 7306 0055;
  - verbally in person with Gallery staff;
  - or by letter addressed to:

National Portrait Gallery  
39-45 Orange Street  
London  
WC2H 7HS

## Policies and Procedures

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- 5.3 All visitor comments received by the Gallery (verbally in person with Gallery staff, by email, telephone, and letter) are logged and monitored as part of the Gallery's ongoing efforts to improve visitors' experience. Compliments and comments about staff and volunteers are shared with the relevant teams for information. All comments, suggestions and complaints are regularly shared with Directors.
- 5.4 For general feedback and informal complaints, we aim to resolve the problem immediately or inform the complainant what we plan to do to put it right at the point that the informal complaint is received.
- 5.5 If for any reason the complainant feels that they are unhappy with the Gallery's response or if the complaint relates to a more serious matter, this should be raised as a formal complaint.

### Formal Complaint

#### Stage one

- 5.6 If you would like to make a formal complaint you should make contact with the Contact Centre using the details provided above (paragraph 5.2). This will be referred to a more senior member of staff, who will usually be the relevant Head of Department, for investigation. The formal complaint will be acknowledged and a response provided to you following the investigation as per the timeframes set above.
- 5.7 The response will detail any actions taken to investigate the complaint and provide a full explanation of the decision made and the reason(s) for it. Where appropriate, it will include details of actions the Gallery will take to resolve the complaint.

#### Stage two

- 5.8 If you are dissatisfied with the outcome of your complaint it may be referred to stage 2. This must be actioned within 15 working days of the date of the outcome of the previous stage.
- 5.9 The complaint will be escalated to a member of the Director's Group. This will involve a review of the investigation conducted at stage one and an outcome will be communicated to you in writing within the timescales outlined above. Any requested additional information or clarification should be provided promptly. The Gallery may pause or close a complaint where requested additional information or clarification is not provided.
- 5.10 The outcome may result in:
  - An explanation
  - An acceptance that the situation could have been handled differently or better
  - An assurance that the Gallery will try to ensure the event complained of will not recur
  - An explanation of the steps that have been or will be taken to help ensure that it will not happen again and an indication of the timescales within which any changes will be made
  - An undertaking to review Gallery policies in light of the complaint
  - An apology
- 5.11 If you feel that a complaint which has been escalated to the Gallery's Director's Group has not been addressed appropriately, you may request that the matter be referred to the Board of Trustees of the Gallery.

### Review by the Board of Trustees

- 5.12 The Board of Trustees, acting by the Chair or the Chair of the Audit and Risk Committee in consultation with the Head of Governance will appoint at least one Trustee or independent member (a non-executive member who sits on one of the Board's subcommittees), or more depending on the nature of the complaint, to review the handling of the complaint. This will involve an assessment of the handling of the complaint and may result in recommendations to the Gallery on improvements to its policies and practices relating to the area to which the complaint refers. This will be communicated to you in writing within the timescales outlined above.

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Policies and Procedures

- 5.13 The person(s) appointed will determine an appropriate procedure and timetable for the review and will generally seek to reach a final determination within twenty working days of appointment by the Board of Trustees subject to all required information being available.
- 5.14 In the unlikely event that you are unhappy with the outcome of this final stage, they may wish to take up the matter with the [Parliamentary and Health Care Ombudsman](#).

**6. Conduct**

- 6.1 The Gallery will engage with anyone wishing to make a complaint in a fair, transparent and constructive manner. It is not the function of this Policy to address complaints which are deemed unreasonable or vexatious, as described below:
- Making repeated approaches about the same issue without raising new information.
  - Making frivolous or vexatious requests for information, i.e. which are not a genuine endeavour to seek redress, but are aimed at disrupting the business of the Gallery or harassing Gallery staff.
  - Raising unrelated concerns or refusing to accept a decision where explanations for the decision have been given.
  - Requesting responses in unreasonable timescales.
  - Refusing to engage with the complaints process.
- 6.2 There may be rare occasions where, due to a correspondent's behaviour and conduct which is adversely affecting our staff's ability to do their work and provide services to others, we will restrict the contact that person has with us. Examples of unacceptable behaviour include use of discriminatory or offensive language, abuse, harassment, aggression, refusal to cooperate, unacceptable demands, or unacceptable levels of contact.
- 6.3 Such scenarios will be handled in accordance with the Gallery's internal procedures for unacceptable behaviour by members of the public or other stakeholders we interact with.

**7. Freedom of Information**

- 7.1 Complaints about the handling of Freedom of Information requests are subject to the appeals and complaints procedure as outlined under the terms of the Freedom of Information Act.
- 7.2 If a correspondent feels that a Freedom of Information request has not been addressed appropriately, the correspondent should, in the first instance, seek an internal review of the decision received. Requests for internal review should be submitted in writing to the Head of Governance by email at [FOIrequest@npg.org.uk](mailto:FOIrequest@npg.org.uk) or letter:

National Portrait Gallery  
39-45 Orange Street  
London  
WC2H 7HS

Further information about this procedure can be found on the Gallery's website:  
[www.npg.org.uk/about/foi/freedom-of-information.php](http://www.npg.org.uk/about/foi/freedom-of-information.php)