

Complaints Policy

1. Introduction

- 1.1 Medical Research UK (the charity) is committed to high standards of integrity, transparency and accountability in all its activities.
- 1.2 This policy sets out how the charity receives, handles and learns from complaints to improve its work and maintain public trust.
- 1.3 The purpose of this policy is to:
 - Provide a clear and accessible route for raising complaints
 - Ensure complaints are handled fairly, consistently and promptly
 - Support learning and continuous improvement
 - Protect the rights of complainants and those subject to complaints.
- 1.4 This policy outlines the principles by which individuals may raise issues and through which we will respond in a timely and accountable manner.
- 1.5 The Policy applies to all staff, volunteers, and stakeholders.

2. Principles

- 2.1 The principles of the policy are:
 - Fairness and impartiality in all investigations.
 - Timely responses and clear communication in Plain English.
 - Acting on learning from complaints.
 - Compliance with relevant regulatory guidance throughout the complaints process.
 - Confidentiality, respect for privacy and compliance with data protection regulations.
 - Accessibility for all, including reasonable adjustments for disabilities or language needs.

3. Equity, Diversity and Inclusion

- 3.1 The charity is committed to ensuring that all individuals are treated fairly and with respect when raising or responding to a complaint.
- 3.2 The charity aims to provide a complaints process that is inclusive, accessible and free from discrimination.
- 3.3 No individual will be treated less favourably because of their age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.
- 3.4 The charity will take reasonable steps to ensure that its complaints process is accessible to all. This may include, where appropriate:
 - Providing information in alternative formats (e.g. large print or accessible digital formats)
 - Making reasonable adjustments for individuals with disabilities
 - Providing additional support for individuals who may be vulnerable or require assistance in communicating their complaint.
- 3.5 All complaints will be assessed and handled objectively, based on the facts and evidence available.
- 3.6 Decisions will be made without bias and in line with the principles set out in this policy. The charity will

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evidence fairness and impartiality by ensuring that complaints are assessed against the facts and available evidence, that investigators are independent of the matters being complained about wherever possible, that decisions are documented with clear reasons, and that a record is maintained of the evidence considered and the rationale for the outcome. Learning arising from complaints will be monitored through the complaints log and periodic reporting to the Senior Management Team (SMT) and the Board of Trustees.

- 3.7 Where equity-related issues are raised as part of a complaint, these will be taken seriously and investigated thoroughly. Any learning identified will inform improvements to our policies, processes and practice.

4. Scope

- 4.1 This policy applies to complaints made by:

- Applicants and grant holders
- Donors and supporters
- Partners and suppliers
- Members of the general public
- Volunteers (including trustees, independent committee members and panel members) and Lived Experience Experts (LEEs).

- 4.2 This policy covers complaints about:

- Decisions or actions
- Failure to act or delays in action
- Conduct of employees, volunteers, or representatives.

- 4.3 This policy does **not** apply to:

- Employee grievances (covered by various HR policies)
- Whistleblowing disclosures (covered by the Whistleblowing Policy)
- Safeguarding concerns (managed under the Safeguarding Policy)
- Appeals against funding decisions where a separate appeals process exists.

5. Definition of a complaint

- 5.1 A complaint is defined as any expression of dissatisfaction, however made, about decisions and actions taken or a lack of action by the charity.
- 5.2 Where there is uncertainty, the individual will be asked whether they wish their concern to be handled as a formal complaint, and the process of a formal complaint will be clearly described to them.
- 5.3 Routine requests for information or service issues resolved at first point of contact will not normally be treated as complaints unless the individual requests this.

6. How to complain

- 6.1 Complaints can be made in writing or verbally.

- 6.2 Complaints can be submitted via email, phone or post.

- Email: governance@medicalresearchfoundation.org.uk
- Post: Medical Research UK, Watchmaker Court, 33 St John's Lane, London EC1M 4BJ
- Phone: 020 4581 2400

- 6.3 We do not consider comments, feedback or concerns raised via social media to be formal complaints

under this policy. However, we routinely monitor our social media channels and, where a post appears to fall within the scope of this policy, we will encourage the individual to submit a formal complaint through the process set out in Annex 1.

7. Roles and Responsibilities

7.1 All employees and volunteers:

- Receive complaints courteously and escalate them in line with this policy and the complaints handling procedure.
- Attempt informal resolution where appropriate in line with the complaints handling procedure.

7.2 Governance team:

- Log, track and monitor complaints.
- Compile periodic reports to the SMT and an annual report to the Board of Trustees.

7.3 Designated complaint handler/investigator:

- Acknowledge complaints and coordinate responses.
- Ensure complaints are logged and tracked.
- Own the response.

7.4 Head of Function:

- Consider whether complaints are unreasonable or vexatious (as defined in section 11 below).
- Act as complaint handler/investigator for most complaints.

7.5 Directors:

- Ensure investigations are fair, proportionate, and documented.
- Following the conclusion of a complaint, consider whether any operational changes are required considering the outcome of that complaint.
- Discuss complaints at SMT meetings on a quarterly basis.

7.6 Chief Executive:

- Oversee the effective operation of the policy.
- Review complex or high-risk complaints. High-risk complaints may include those involving safeguarding concerns, serious reputational risk, allegations of unlawful conduct, significant financial implications, media interest, regulator involvement, or matters involving senior personnel.
- Ensure learning is embedded.

7.7 Board of Trustees:

- Provide oversight of complaint trends and serious cases.
- Review escalated complaints where appropriate.

8. Complaints from employees

- 8.1 These will be dealt with in accordance with the Grievance Policy, the Bullying and Harassment Policy, or the Whistleblowing Policy, as appropriate.

9. Data protection complaints

- 9.1 A data protection complaint is where someone is unhappy with how the charity has handled their personal data.

- 9.2 These complaints are dealt with in accordance with the Data Protection Policy and a separate Complaints procedure.

10. Complaints from vulnerable persons

- 10.1 The charity recognises that some individuals may be in circumstances that make it more difficult for them to access the complaints process, communicate their concerns, understand information provided, or engage effectively with an investigation.
- 10.2 Vulnerability may arise from a wide range of circumstances and may be temporary, fluctuating or permanent. This could include factors relating to physical or mental health, disability, age, bereavement, caring responsibilities, financial circumstances, personal situation, communication needs or other factors affecting an individual's ability to engage with the complaints process.
- 10.3 Where an individual identifies themselves as vulnerable, or where vulnerability becomes apparent during the handling of a complaint, employees will be mindful of the individual's circumstances and consider whether reasonable adjustments or additional support may be appropriate to enable them to participate fully in the complaints process.
- 10.4 Any adjustments made will be proportionate to the individual's needs and the circumstances of the complaint, whilst ensuring that the complaints process remains fair, consistent and accessible to all parties.

11. Unreasonable or vexatious complaints

- 11.1 The charity reserves the right to take reasonable and proportionate steps to manage complaints that are:
- Repetitive without new evidence
 - Abusive, threatening, or harassing
 - Unreasonably persistent.
- 10.2 In such cases, the charity may limit contact or discontinue correspondence, while ensuring decisions are fair and documented.
- 10.3 Any such decisions must be proportionate and approved by Head of Function or a more senior manager.
- 10.4 Where the behaviour of a complainant gives rise to concerns about the safety, wellbeing or security of employees, volunteers, trustees or others acting on behalf of the charity, appropriate measures may be taken to protect those individuals.
- 10.5 This may include restricting contact, requiring all communications to be made through a single point of contact, reporting threats or suspected criminal activity to the police, seeking legal advice, or taking any other reasonable and proportionate steps necessary to safeguard individuals and the charity.
- 10.6 Any decision to take such action will be based on the nature and seriousness of the behaviour, be proportionate to the risk presented, and be approved by the relevant Director, Chief Executive or, where appropriate, the Board of Trustees.
- 10.7 A record will be kept of any decision to restrict contact or take protective action, including the rationale for the decision and any supporting documentation.

12. Confidentiality and data protection

- 12.1 All complaints will be handled with due regard to both privacy and confidentiality, and in accordance with applicable data protection legislation. Information relating to a complaint will only be collected, used and shared where necessary for the purpose of investigating and resolving the complaint. The charity recognises that individuals involved in a complaint, including complainants, witnesses and those who are

the subject of a complaint, have legitimate expectations of privacy. Information will therefore be disclosed on a need-to-know basis and the charity will take reasonable steps to avoid unnecessary intrusion into individuals' private affairs

12.2 Information will be:

- Shared only with those who need to know for the purposes of investigating or resolving the complaint
- Used only for legitimate complaint-handling purposes
- Stored securely
- Retained in line with the charity's data retention policies and applicable legal requirements.

13. Monitoring, reporting and learning

13.1 All complaints are recorded in a central log, managed by the Governance team.

13.2 The complaints log will record the complaint, the investigator, evidence reviewed, outcome reached and the rationale for the decision, enabling the charity to demonstrate consistency, fairness and compliance with this policy

13.3 Complaints provide the charity with an opportunity to improve processes and identify and mitigate risk, so consideration is given after the conclusion of each complaint by the relevant Director as to whether there are any changes that need to be made to operations considering that complaint. Any such actions will be recorded in the complaints log.

13.4 In addition, the complaints log is reviewed quarterly by SMT and annually by the Board of Trustees.

13.5 Complaints reports to the Board will include:

- Number of complaints
- Themes/trends
- Severity/risks
- Learning actions
- Learning will inform improved policies, processes and service delivery.

14. Review

14.1 This policy will be reviewed triennially or as business reasons dictate.

15. Associated relevant legislation

- Charities Act 2016: mandates charities to report the number of complaints they have received in their annual statements.
- Charities Act 2011 (as amended): sets duties for trustees, including reporting serious incidents.
- Code of Fundraising Practice: Section 2.3 Complaint Handling.
- UK GDPR & Data Protection Act 2018: foundational legislation on complaints regarding use of personal data.
- Data (Use and Access) Act 2025: mandatory internal complaints procedure for all organisations handling personal data.