

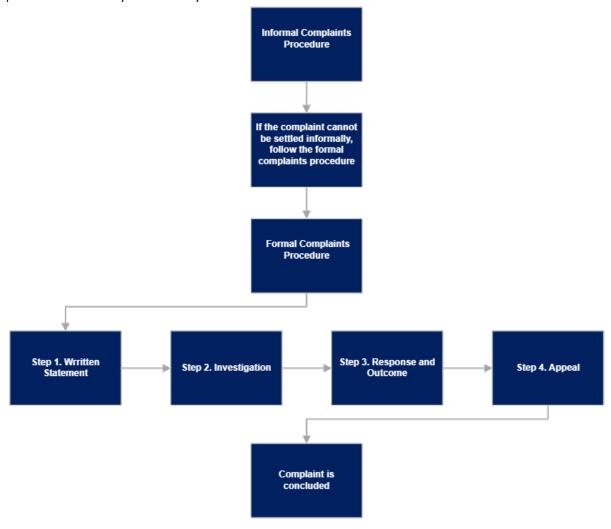
# TOTTENHAM HOTSPUR FOOTBALL CLUB

# Global Football Development Complaints Policy

February 2024

# Summary of the Complaints Procedure

The purpose of this Global Football Development Complaints Policy (the "Policy") is to set out how participants, a family member or guardian of one of our participants, a local resident or someone external who has come into contact with the Club's Global Football Development Team can raise a complaint and how the Club will investigate and deal with complaints. The complaints procedure is summarised below, but for further details, please read this Policy in its entirety.



If, having raised a complaint, you have any safeguarding concerns this should be referred to the Safeguarding Team promptly at safeguarding@tottenhamhotspur.com.

- 1. <u>Informal Complaints Procedure</u>: If a complaint is needed, please first make an informal complaint with the relevant member of staff in the Global Football Development Team. Where it is not possible for you to talk to the immediate relevant member of staff in the Global Football Development Team, or if the complaint concerns them, you should instead talk to the next most senior person.
- 2. If the complaint cannot be settled informally, the matter should be dealt with according to the formal complaints procedure.
- 3. Formal Complaints Procedure: You may submit a formal complaint via email to soccer.schools@tottenhamhotspur.com and/or provide a written letter of the complaint to the relevant member of staff in the Global Football Development Team. If the complaint concerns relevant member of staff in the Global Football Development Team, you should submit it to another member of the Global Football Development team or the Head of Safeguarding and Welfare.

Step 1. Written Statement: The complaint should be put in writing and headed "Formal Complaint".

<u>Step 2. Investigation</u>: Once the Global Football Development Team has received your complaint, the Operations Team will write to you to inform you: (i) who will be handling and investigating your complaint; (ii) when you can expect a response; (iii) how we will communicate the response; and (iv) how we will make sure that your personal data is only used for the investigation of your complaint. We will then carry out an investigation of the complaint.

<u>Step 3. Response and Outcome</u>: Once the investigation is complete, the Investigating Manager will consider the evidence, come to a decision and inform you of: (i) what the investigation covered; (ii) the conclusions from the investigation; (iii) any actions or recommendations that result from these conclusions; and (iv) what you need to do if you feel your complaint has not been investigated properly.

<u>Step 4. Appeal</u>: You may appeal to the Head of Global Coaching against the decision of the Investigating Manager in writing within five (5) working days of being informed of the outcome of the review. Once the Head of Global Coaching has reached a conclusion about your appeal, we will write to tell you: (i) the decision; (ii) the reasoning; and (iii) any actions or recommendations that result from the conclusion.

4. This is the end of the complaints procedure and there is no further appeal.

#### Introduction

#### Scope

The Policy enables Tottenham Hotspur Football and Athletic Co. Ltd (trading as "Tottenham Hotspur Football Club"), its Group Companies, and Tottenham Hotspur Women's Football Club Limited – together the "Club" to ensure that any problems, complaints, or concerns in relation to the Club's Global Football Development Programme are dealt with in a fair, timely and consistent manner.

In the application of this Policy and the accompanying procedures, the Club is committed to ensuring that no one is treated less favourably because of their age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation and that the Club's commitment to diversity and inclusion is promoted.

The Club considers it important that all participants have access to a procedure to help deal with any complaints relating to their participation fairly and without unreasonable delay. We aim to investigate any formal complaint you raise, inform you in writing of the outcome, and give you a right of review and appeal if you are not satisfied. The purpose of this Policy is to set out how participants, a family member or guardian of one of our participants, a local resident or someone external who has come into contact with the Club's Global Football Development Programme can raise a complaint and how we will investigate and deal with complaints.

Global Football Development's aim is to operate to the highest standards at all times; however, we recognise that things can sometimes go wrong, giving rise to a complaint. If complaints are handled well, good relations can be maintained, damage can be minimised and we can use the learning to help improve what we do in the future. This Policy and its procedure are intended to help us achieve that.

The equality impacts of this Policy were reviewed as part of the approval process and it was not considered necessary to conduct a full Diversity Impact Assessment.

Thank you for your cooperation in making our programmes a safe and enjoyable environment for all players. We appreciate your feedback, and we will use it to improve our programmes moving forward.

### **Approach**

This approach to dealing with complaints is underpinned by the following arrangements:

- there is a fair, three-stage procedure, incorporating potential escalation with the option for the Club's Board to seek external assistance if required;
- this procedure is clear and easy to use and is available on the website with a dedicated email address for those wishing to make a complaint;
- there is a clear internal procedure for staff which sets out responsibilities for dealing with complaints.
  This is communicated to staff and trustees. Responsibilities may be varied if necessary to avoid potential conflicts of interest;
- all complaints or concerns are investigated fairly, impartially and as far as possible in line with the timeframes set out in this Policy;
- complaint information is treated with appropriate sensitivity and confidentiality and in line with any relevant data protection requirements;
- progress on the handling of a complaint and its eventual outcome is communicated to complainants in line with this Policy;
- any general recommendations arising from the investigation of a complaint are communicated to be built into service and practice improvements; and
- the Club's Board will receive data relating to complaints and concerns received in the previous quarter as part of its Standing Agenda item.

### Who does this Policy apply to?

This Policy applies to the participants our activities, a family member or guardian of one of our participants, a local resident or someone external who has come into contact with the Club's Global Football Development Programme for some other reason and you're dissatisfied with something we've done or how we've treated you, let us know as soon as possible.

### Who is responsible for this Policy?

The Global Football Development Team have day-to-day responsibility for this Policy, and you should refer any questions about this Policy to them in the first instance.

Due to the potentially sensitive nature of complaints, our staff are reminded of the need for confidentiality and that as they will be handling personal data, they should ensure that all Data Protection requirements are met.

Our staff are responsible for ensuring that they know what is expected of them by familiarising themselves with this Policy and the procedures contained herein.

# **Using this Policy**

The Club's Global Football Development Team aim to deliver the very best services and treat everyone who contacts us with fairness and respect. If you think we have fallen short of our high standards, we would like to hear from you so that we can try to put things right and make sure that things don't go wrong again. This Policy tells you how to make a complaint.

Issues that could cause complaints include but are not limited to:

| Safeguarding                      | Health and Safety | Relationships        |
|-----------------------------------|-------------------|----------------------|
| Bullying and Harassment           |                   | Coaching Environment |
| Coaching practices and approaches | Discrimination    | Medical Treatment    |

If you have difficulty understanding this Policy or any stages described herein because of a disability or because English is not your first language, you should discuss the situation with a member of the Global Coaching team as soon as possible.

Written complaints will be documented with a record of any decisions taken and any notes or other documents/evidence compiled during the complaints process. These will be processed in accordance with the Club's Data Protection Policy.

# Informal Complaints Procedure

Where possible, we suggest discussing the complaint with the relevant member of staff in the Global Football Development Team on an informal basis first. This member of staff will discuss any concerns with you and attempt to resolve the matter within a reasonable timescale. Where it is not possible for you to talk to their immediate relevant member of staff in the Global Football Development Team, or if the complaint concerns them, you should instead talk to the next most senior person.

Where the informal procedure is used, both the individual making the complaint and the individual hearing the complaint should keep a written record of the meeting including what was discussed and any proposed action.

If, having raised a complaint, you have any safeguarding concerns this should be referred to the Safeguarding Team promptly at safeguarding@tottenhamhotspur.com.

If the complaint has not been resolved or cannot be settled informally, the matter should be dealt with according to the Formal Complaints Procedure below.

## Formal Complaint Procedure

If your complaint cannot be resolved informally you should follow these steps. Initially, you should submit a formal complaint via email to soccer.schools@tottenhamhotspur.com and/or provide a written letter of the complaint to the relevant member of staff in the Global Football Development Team.

If the complaint concerns relevant member of staff in the Global Football Development Team, you should submit it to another member of the Global Football Development team or the Head of Safeguarding and Welfare.

### Step 1 – Written Statement

The first step of the formal complaint procedure is for the complaint to be put in writing and headed "Formal Complaint".

This written statement will form the basis of any investigations and hearing, so it is important to set out clearly the nature of the complaint including all relevant facts, evidence, dates, names of individuals involved and the outcome you are seeking.

If the complaint is unclear, you may be asked to clarify the complaint before any meeting takes place.

**IMPORTANT**: Please make sure you include your name and tell us how you want us to contact you. We will not be able to investigate your complaint without this information.

If, having raised a complaint, you have any safeguarding concerns this should be referred to the Safeguarding Team promptly at safeguarding@tottenhamhotspur.com.

### Step 2 – Investigation

Once we have received your complaint, the Operations Team will write to you, enclosing a copy of this Policy to inform you:

- who will be handling and investigating your complaint this will normally be one of our managers who has not been involved in your complaint;
- when you can expect a response we aim to get back to you within fourteen (14) working days. It may take longer if your complaint is very complicated, or the people we need to speak to are not available;
- how we will communicate the response (whether by email, post or both); and
- how we will make sure that your personal data is only used for the investigation of your complaint.

We will then carry out an investigation with the aim of resolving your complaint to your satisfaction.

We kindly ask that you co-operate fully and promptly in any investigation. This may include informing us of the names of any relevant witnesses, disclosing any relevant documents to us and attending interviews, as part of our investigation.

If for any reason we cannot meet the timescale we have given you, we will contact you with a new date and explain what has caused the delay.

### Step 3 – Response and Outcome

When the investigation is complete, the Investigating Manager will consider the evidence and come to a decision in relation to your complaint. We aim to communicate the outcome to you within fourteen (14) working days of the allegation being made, unless your complaint is of a complicated nature or the individuals that we need to speak to are not available. If we are unable to make this timescale, we will contact you with a new date and explain what has caused the delay.

We will write to tell you:

- what the investigation covered;
- the conclusions from the investigation;
- any actions or recommendations that result from these conclusions; and
- what you need to do if you feel your complaint has not been investigated properly.

The outcome of an investigation will depend on the specific complaint ad is at the Club's sole discretion. However, the following actions are example of what could occur:

- taking no action;
- apologising to you;
- taking disciplinary action against a coach or volunteer;
- making changes to the programme, such as providing additional training for coaches or volunteers;
- referring the complaint to the Head of Safeguarding and Welfare, local council, or the FA;
- conducting a risk assessment to ensure health and safety standards are being met;
- · reviewing medical equipment and processes; and/or
- offering a gesture of goodwill.

## Step 4 – Appeal

You may appeal to the Head of Global Coaching against the decision of the Investigating Manager under this Policy, if you can demonstrate at least one of the following:

- the investigation was not conducted in line with this procedure; and/or
- new evidence, which the investigation was not able to consider, has now become available.

You must send your appeal, and the grounds for your appeal, in writing (by letter or email as before) within five (5) working days of being informed of the outcome of the review.

We will write to you within five (5) working days of receiving your appeal to tell you:

- who will be considering your appeal this will be the Head of Global Coaching. They may also seek external assistance if the Board think this is appropriate;
- when you can expect a response we aim to get back to you within twenty-eight (28) working days of receiving your appeal. If we cannot do this, we will let you know and give you the expected timescale; and
- how we will communicate the response (whether by email, post or both).

When the Head of Global Coaching has reached a conclusion about your appeal, we will write to tell you:

- the decision in relation to your appeal;
- their reasons for coming to this conclusion; and
- any actions or recommendations that result from their conclusion.

This is the end of the procedure and there is no further appeal.

## Confidentiality

We hope that you will feel able to voice complaints and concerns openly under this Policy. Individuals raising complaints and concerns who are concerned about possible reprisals if their identity is revealed should come forward to the Head of Global Football Development and appropriate measures can then be taken to preserve confidentiality, where possible.

However, in certain circumstances in order to comply with legal obligations or to obtain the required information to properly investigate a complaint, the Club will be required to disclose information to relevant bodies or departments. Where information is required to be disclosed, this will be done on a need-to-know basis only.

# Safeguarding

The Club's Global Football Development Team are committed to the safeguarding and welfare of all participants in our programmes. We have robust safeguarding policies in place and we will take all necessary steps to protect children from harm.

The Club's various safeguarding policies are available on the Club's website here.