

# National Rifle Association

## Complaints Procedure

Adopted by Council on 17 April 2021

### 1. Introduction and scope

- 1.1 This document explains how the National Rifle Association (“**NRA**”) assesses and responds to complaints.
- 1.2 This procedure applies to complaints received from NRA members and members of the public on or after the date this procedure was adopted by Council. Depending on the nature of your complaint, it may be appropriate for us to apply a different NRA procedure. If that is the case, we will let you know and send you a copy of the procedure we are applying to your complaint.
- 1.3 If you have suggestions or feedback for constructive improvements, please send your ideas to [feedback@nra.org.uk](mailto:feedback@nra.org.uk) rather than using this procedure. It is useful, but not essential, if you can provide some indication of the specific benefits you think would result from your suggestion.
- 1.4 This procedure does not apply to any of the following (“**Excluded Matters**”):
  - 1.4.1 complaints by employees of the NRA, which should be dealt with in accordance with the NRA Employee Handbook including its Whistleblowing Policy;
  - 1.4.2 complaints by customers of the National Shooting Centre Limited (“**NSC**”) concerning goods or services supplied by the NSC (including range and target hire, ammunition sales, accommodation, food and beverages, and clay shooting activities at the National Clay Shooting Centre and Bisley Shooting Ground ), which should be referred to the NSC;
  - 1.4.3 complaints about shooting clubs (whether affiliated to the NRA or not) or any other organisation, which should be referred to the officers of that organisation;
  - 1.4.4 complaints about the outcome of any hearing held under the Disciplinary Code, which should be dealt with by the Disciplinary Body under the Disciplinary Code;
  - 1.4.5 complaints about competitions organised by the NRA, which should be dealt with under the rules applicable to that competition;
  - 1.4.6 complaints about any decision made by a Principal Committee of General Council, which should be referred to your Regional or Discipline Representative on General Council to be addressed by General Council;
  - 1.4.7 matters that have already been the subject of a complaint under this or another NRA procedure and do not relate to new matters that merit further investigation or consideration;
  - 1.4.8 complaints about any decision made in accordance with this procedure;
  - 1.4.9 complaints about decisions of Council made in accordance with a procedure set out in the Second Schedule, which should be dealt with under the Second Schedule; and

- 1.4.10 complaints about any matter arising under any agreement with the NRA that contains a dispute resolution mechanism, which should be dealt with using the dispute resolution mechanism in that agreement.

## **2. What is a complaint?**

- 2.1 A complaint is any expression of dissatisfaction about something the NRA or its trustees, staff or volunteers have done or failed to do.
- 2.2 We are committed to demonstrating high standards in all our dealings with our members and the public. If we fail to meet those high standards, we want to hear about it so that we can respond to your concerns, put things right and learn lessons for the future.
- 2.3 We take all complaints seriously and aim to deal with them promptly and fairly.

## **3. Who can make a complaint?**

- 3.1 Anyone affected by something the NRA has done or failed to do can make a complaint by following the process set out in this procedure.
- 3.2 If, for any reason, you are unable to make the complaint yourself, a representative (such as a friend or family member) may make a complaint on your behalf. In this case your representative should explain why you are unable to make the complaint yourself. We may need to contact you direct to confirm that you have consented to your representative acting on your behalf.

## **4. How do I make a complaint?**

- 4.1 If the issue relates to a specific service or individual you are already in contact with, in the first instance you should seek to resolve the matter with your current point of contact. If you have not already done so and you make a complaint under this procedure, we may ask you to try to resolve the matter with your point of contact before we take any further action.
- 4.2 If the issue remains unresolved, or if it does not relate to a specific service or individual you are already in contact with, you can make a complaint under this procedure. There is a complaint form at the end of this procedure. You do not have to use this form, but it is helpful if you do. You can send the complaint:
  - 4.2.1 by email to: [complaints@nra.org.uk](mailto:complaints@nra.org.uk); or
  - 4.2.2 by post to: Complaints Manager, National Rifle Association, Bisley Camp, Brookwood, Surrey GU24 0PB.
- 4.3 To enable us to deal with your complaint efficiently and fairly, please provide the following information in your complaint:
  - 4.3.1 your name;
  - 4.3.2 your contact details including address, email address and telephone number;
  - 4.3.3 how you would like us to contact you in relation to your complaint;
  - 4.3.4 your relationship to the NRA e.g. member, visitor to Bisley Camp;

- 4.3.5 a detailed description of your complaint with specific information about what you think went wrong, including dates and times of any reported incidents;
  - 4.3.6 details of what you have done to resolve the issue so far;
  - 4.3.7 what action would you like us to take in response to your complaint; and
  - 4.3.8 copies of any documents and other evidence to support the complaint.
- 4.4 It is important that any complaint is accompanied by evidence to ensure the resources of the NRA are properly allocated in investigating it and to ensure fairness and due process for the person about whom the complaint is made. We will not consider complaints for which there is no credible evidence. If there is differing evidence on any factual matter, the evidence will be evaluated on the basis of the balance of probabilities i.e. whether that fact is more likely than not.
- 4.5 Information you provide under this procedure will be held in accordance with our Privacy Policy and be processed as set out in this procedure. We will ask you to consent to us processing the information you provide and your personal data to enable us to deal with your complaint, including disclosing that data to the Complaints Manager, Complaints Assessor, Trustees, legal and other professional advisers and, where appropriate, independent persons as described in para 5.5.
- 4.6 We appreciate that you may wish to make a complaint on an anonymous basis. If you withhold your name, we will take steps to investigate your complaint to the extent possible. However, if you provide your name and contact details it makes it easier for us to investigate the complaint fully and verify information and it enables us to inform you of the progress of our investigations. You may ask us to keep your name confidential and specify any other aspects of the complaint that contain sensitive information, but this may make it more difficult for us to investigate your complaint fairly and efficiently. Our legal and regulatory obligations mean that we may need to disclose the existence, nature and content of your complaint (including your name) to a third party such as the police, a local authority or the Charity Commission, including by submitting a Report of a Serious Incident.
- 4.7 Complaints should usually be made within three months of the event being complained about. This is because if more than three months have passed since the event complained about, it may not be possible for us to investigate the complaint fairly. Therefore, we may decline to investigate complaints made outside this timeframe. However, we may investigate complaints made after more than three months if there is a good reason why you did not make the complaint sooner, and we think we are still able to deal with the complaint fairly.

## 5. **What happens next?**

- 5.1 We will deal with complaints as quickly as practicable. We aim to acknowledge receipt of complaints within ten working days of receipt, and provide a full response within three months of receipt. In some cases, there may be reasons why we need to extend these timescales, for example if a key member of staff is away or the complaint is complex. If that happens, we will let you know our amended response time and the reasons for it.
- 5.2 Your complaint will be logged on our system and referred to the Complaints Manager. The Complaints Manager is the Secretary General of the NRA, or if there is a conflict of interest in

relation to a particular complaint, another member of the senior management team of the NRA nominated by the Secretary General for this purpose.

- 5.3 The Complaints Manager may delegate the investigation of the complaint to a Complaints Assessor. The Complaints Assessor will be an employee of the NRA or a third party independent of the NRA. A person may act as Complaints Assessor only if that person has no conflict of interest in relation to the complaint. The Complaints Manager remains responsible for the administration of the complaint and so the name of the Complaints Assessor will not normally be published.
- 5.4 The Designated Trustee in relation to complaints will be a Trustee appointed by Council for this purpose and who is independent of the original decision-maker and of the event complained about.
- 5.5 Each Complaints Assessor, the Complaints Manager and the Designated Trustee may consult legal and other professional advisers, NRA employees and Trustees who have no conflict of interest to assist them in carrying out their work. The Complaints Manager may, with the approval of Council, refer a complaint to an independent person for investigation where that is appropriate in light of the seriousness or complexity of the complaint.
- 5.6 All email correspondence in relation to a complaint must be sent to [complaints@nra.org.uk](mailto:complaints@nra.org.uk) and not to the personal or individual NRA email address of the Complaints Manager or any other person. This is to ensure that email correspondence relating to complaints is administered effectively and properly recorded.
- 5.7 This procedure operates on the basis of documents and does not involve holding hearings or receiving oral evidence from any person.
- 5.8 This procedure is not designed as a process for obtaining information and you should send requests for information to the relevant NRA staff member.

## **6 Stage 1 (initial assessment)**

- 6.1 The Complaints Assessor will carry out an initial review of your complaint in order to assess whether it warrants further investigation under this policy and report to the Complaints Manager. The Complaints Manager will decide whether your complaint should proceed to Stage 2 of this procedure. If the complaint relates to the Secretary General or a Trustee, the Designated Trustee will act as Complaints Manager for the purposes of the Stage 1 assessment.
- 6.2 Some examples of reasons why a complaint would not proceed to Stage 2 are:
  - 6.2.1 you have not taken steps to try to resolve the issue with the person complained about, where this would have been appropriate;
  - 6.2.2 it would be appropriate to apply a different NRA policy to the complaint, in which case you will be informed of this and provided with a copy of that policy;
  - 6.2.3 the matter should be investigated by the police (in the case of a complaint alleging criminal conduct) or other regulatory body;
  - 6.2.4 the complaint is frivolous or vexatious;

- 6.2.5 the complaint relates to an Excluded Matter as defined in paragraph 1.4;
  - 6.2.6 you have not provided credible evidence to support the complaint;
  - 6.2.7 the complaint is vague or lacks sufficient detail for it to be investigated effectively
  - 6.2.8 you allege there has been a breach of law or regulation but do not refer to the specific provision of law or regulation or the nature of the breach; or
  - 6.2.9 it would be a disproportionate use of the NRA's charitable resources to consider the complaint.
- 6.3 The Complaints Manager will tell you the outcome of the Stage 1 assessment in writing, including summary reasons for the decision made.
7. **Stage 2 (full assessment)**
- 7.1 If the Complaints Manager determines at Stage 1 that your complaint requires further investigation or consideration, your complaint will be investigated within a reasonable timescale in order to establish the relevant facts. The Complaints Assessor will review all relevant evidence provided by you and may also gather and take into account other evidence. This may include asking you for further information or speaking to other individuals involved. The Complaints Assessor will report the results of the investigation to the Complaints Manager. If the complaint relates to the Secretary General or a Trustee, the Designated Trustee will act as Complaints Manager for the purposes of the Stage 2 assessment.
- 7.2 If a complaint relates to the conduct of an individual or a group of individuals, we will inform them of the complaint made against them and give them an opportunity to respond. To do this, we will need to provide them with the details of your complaint. If you do not allow us to do that, we will not be able to investigate the complaint. Exceptions to this rule will be assessed on a case-by-case basis. For example, it would not be appropriate for us to inform an individual where to do so may present a risk to you or others.
- 7.3 The Complaints Manager will tell you the outcome of your complaint in writing, including reasons for the decision made and, if your complaint is upheld, the steps we have taken or are taking to put things right. We will show a draft of that outcome to any person named in it and allow them 21 days to comment on statements of fact, but not on the conclusions. Some examples of the steps we may take are:
- 7.3.1 an apology and explanation of what went wrong;
  - 7.3.2 correcting the failure or, where it cannot be corrected, mitigating its effects as far as possible;
  - 7.3.3 reviewing our policies and procedures relating to the matter; and
  - 7.3.4 taking appropriate steps to ensure that the failure does not recur in the future.
8. **Stage 3 (review)**
- 8.1 If your complaint is not upheld or you are unhappy with the resolution offered, you may ask for your complaint to be reconsidered by the Designated Trustee. If the Designated Trustee acted as

Complaints Manager for the Stage 2 review of the complaint, Council shall appoint a different Trustee as Designated Trustee for the purpose of a Stage 3 review of that complaint.

8.2 Your request for a Stage 3 review must:

- 8.2.1 be made in writing within 14 days of the date of the Stage 2 outcome letter;
- 8.2.2 be sent to the Complaints Manager; and
- 8.2.3 provide the information described in the next paragraph.

8.3 A Stage 3 review will only be conducted if you provide:

- 8.3.1 credible grounds for arguing that there was a serious flaw in the procedure which has rendered the outcome unfair; or
- 8.3.2 new evidence that was not available at the time of the Stage 2 assessment and which, if it had been available at that time, may have led to a different outcome.

8.4 The Designated Trustee will determine whether there are grounds for a Stage 3 review. The decision of the Designated Trustee is final.

8.5 If there are grounds for a Stage 3 review, the Designated Trustee may review the complaint handling process, re-investigate the complaint or submit the complaint to someone else for re-investigation and ask for further information about why you think the original decision made was unfair or would have had a different outcome.

8.6 The Designated Trustee will tell you the outcome of this review and any re-investigation in writing, including reasons for the decision made. This should usually be completed within three months of the decision to conduct a Stage 3 review. If your complaint is upheld on review, we will explain the steps we have taken or are taking to put things right. Decisions made at Stage 3 are final.

## 9. **Record keeping and reporting**

9.1 The Complaints Manager shall maintain a register of complaints. The register of complaints will include details of each complaint (including the name and contact details of the complainant if they have been provided), the date the complaint was received, details of any investigations undertaken and copies of all communications relating to the complaint. The records will be retained for at least 24 months from the date that the complaint was made, except where data protection law requires otherwise.

9.2 The Secretary General shall provide a written report to the Trustees at each Council meeting listing new complaints received and the progress of ongoing complaints.

## 10 **Review**

This procedure will be reviewed and revised as required in response to updated legislation and guidance and lessons learnt from complaints received.

## Schedule - Form of Complaint Report

### National Rifle Association

#### Complaint Report

This form is for use by a person who wishes to submit a complaint under the NRA Complaints Procedure. You do not have to use this form, but using this form will help us to address your complaint effectively.

The completed form should be sent by email to [complaints@nra.org.uk](mailto:complaints@nra.org.uk) or may be sent to The Complaints Manager, National Rifle Association, Bisley Camp, Brookwood, Surrey GU24 0PB.

#### 1. About you

*Please provide your name, address, phone number and email address if you want us to be able to contact you, and let us know how you would like to be contacted. You may make a report anonymously but it is helpful if you provide some way to contact you, such as an anonymous email address that does not identify you, so that we can let you know the outcome of your complaint or ask for further information to ensure that your complaint is dealt with fairly and comprehensively. Please also tell us your relationship to the NRA eg member, visitor to Bisley Camp etc.*

#### 2. Your complaint

*Please state your complaint clearly and concisely, including the name of the person the report relates to, the conduct that you are reporting and when the events occurred. If you are reporting a breach of any law please state the specific provision of the law and the nature of the breach. Please also include details of what you have done to resolve the matter so far.*

#### 3. Your evidence

*Please provide the evidence that supports your complaint, with as much relevant detail as you can. A chronological summary of the sequence of events and communications, with dates and times is very helpful. Evidence can include copies of documents, emails and other correspondence, notes of telephone calls, and statements of third parties.*

**4. What would you like to happen?**

*Please state the action you would like us to take in response to your complaint.*

**Data Protection Notice**

Please tick this box to confirm that you consent to the NRA processing information you provide and your personal data to enable the NRA to deal with your complaint, including disclosing that data to the Complaints Manager, Complaints Assessor, Trustees, legal and other professional advisers and, where appropriate, independent persons as described in para 5.5 of the procedure