NATIONAL MUSEUMS NI

# COMPLAINTS POLICY

**September 2026**

## DOCUMENT INFORMATION AND VERSION CONTROL

| Version Control | | | |
|---|---|---|---|
| **Version** | **Reviewed By** | **Date of Review** | **Summary of Changes** |
| 1 | Senior Management | September 2026 | 1. Adoption of updated NIPSO Model Complaints Handling procedure<br>2. Inclusion of a new *Managing Unreasonable Complainant Conduct Policy* |
| 2 | Audit & Risk Assurance Committee | N/A | |
| 3 | Board of Trustees | N/A | |

Policy Last Updated: December 2024

## SECTION ONE

## INFORMATION & GUIDANCE

### Introduction

National Museums NI is committed to providing a high quality service to all our customers. However, there may be occasions when problems arise and you do not receive the service you expect.

We want to know when an issue has arisen so that we can put it right. We also want to learn from the feedback.

### What is a complaint?

National Museums NI regards a complaint as an expression of dissatisfaction by one or more members of the public, about a perceived failure by our organisation, or our delivery partners, to properly discharge any aspect of our service to an acceptable standard.

### What is not a complaint?

The following will not be dealt with under this Complaints Policy

- Appeals by a supplier or delivery partner of a business decision
- An attempt to reopen a previously concluded complaint or to have a complaint reconsidered where we have already given our final decision.
- Freedom of Information requests.
- Environmental Information Regulations requests.
- Subject access requests.
- Whistleblowing disclosures.
- Procurement disputes.
- Employee grievances.
- Recruitment and appointment processes.
- Matters subject to legal proceedings.
- Insurance claims.

Such requests will be dealt with as routine business matters and you should contact the relevant business area.

### Other ways to engage with us

We are keen to ensure that all complaints about our museum services are dealt with in a satisfactory way and are resolved as quickly as possible.

Often an issue can be resolved quickly and easily by contacting the person with whom you have been dealing. You can do this in person, by telephone, e-mail or letter.

We understand that some customers prefer to share their views on social media, such as Facebook, X, Instagram or external platforms such as TripAdvisor.

We will acknowledge a complaint on the social media platform, and then the details will be followed up with you by telephone, email or letter as dialoguing on public platforms can have the potential to compromise privacy issues. This approach helps comply with our Complaints Policy and with data protection legislation.

**Tell Us At The Time**

Tell us what you think during your visit. Looking after our visitors is our top priority, so our staff are eager to get your feedback in person. We're always open to suggestions, and it's really helpful to hear what our visitors think. In most cases, we can resolve the situation then and there and make sure that you leave looking forward to your next visit.

If your complaint originates at our sites as part of your visitor experience, please approach a staff member if you have a question, comment or complaint. Our staff are identifiable by the National Museums NI branded uniforms, name badges and lanyards or by their period costumes.

If we can't resolve the matter immediately, we will record your feedback.  A manager will then investigate and follow up with you via telephone or email with 15 working days.

All visitor feedback is also included in our regular reviews of service.

**Provide feedback after your visit**

You can also get in touch with us after you've left our sites.

If you have an urgent question, the quickest way to get in touch with us is by phone. Call 02890 428428, Monday – Friday 8am – 4pm.

If you prefer, you can also send us your feedback in writing through the following ways:

By Post: Public Engagement Directorate
National Museums NI

153 Bangor Road
Cultra
Co. Down
BT18 OEU

By Email :

contactcentre@nationalmuseumsni.org

We commit to read and record every piece of correspondence that we're sent. Where a response is appropriate, or requested, we aim to reply to you within 15 working days.

**What we do with visitor feedback**
National Museums NI wants to hear what our visitors are saying about their experience at our four sites;
- Ulster Museum
- Ulster Folk Museum
- Ulster Transport Museum
- Ulster American Folk Park

Feedback is hugely important in helping to constantly inform our decisions on improving our service.

We analyse the trends in our visitor comments to improve our processes, update our policies and support training for our staff. Compliments about National Museums NI staff and volunteers are shared internally and comments or suggestions are forwarded to the relevant departments.

**Our commitment to you**
National Museums NI promise to consider your feedback carefully, to respect your privacy, and to resolve any complaints professionally and to the best of our ability. We commit to being fair and impartial when investigating any issues that you raise and to use what we learn to help maintain and improve our visitor experience.

Our privacy policy can be found here: Privacy Statement | National Museums NI.

NATIONAL MUSEUMS NI

## SECTION TWO

## National Museums NI Complaints Policy

### COMPLAINTS PROCEDURE

You can make your complaint in person, by phone, by email or in writing. We have a **two stage complaints procedure**. We will always try to deal with your complaint quickly. But if it is clear that the matter will need in-depth investigation, we will talk to you about this, agree a way forward and keep you updated on our progress.

### STAGE 1: FRONTLINE RESPONSE

We will always try to respond to your complaint quickly, **within 5 working days** if we can. If you are dissatisfied with our response, you can ask us to consider your complaint at Stage 2.

### STAGE 2: INVESTIGATION

We will look at your complaint at this stage if you are dissatisfied with our response at Stage 1.

We will acknowledge your complaint within **3 working days.** We will confirm the issues of complaint to be investigated and what you want to achieve.

We will investigate the complaint and give you our decision as soon as possible. This will be after no more than 20 working days unless there is clearly a good reason for needing more time.

### NORTHERN IRELAND PUBLIC SERVICES OMBUDSMAN

If, after receiving our final decision on your complaint, you remain dissatisfied with our decision or the way we have handled your complaint, you can ask NIPSO to consider it.

## What to do if you want to complain about the work of National Museum NI?

National Museums NI understands the importance of excellence in the delivery of its museum services. We are committed to creating and developing a positive approach to the museum services we deliver. We strive to consistently exceed expectations of all our visitors and stakeholders. We aim to create an environment within which excellence is seen as essential to the management and delivery of our museum services. We are committed to continual improvement. This includes handling complaints carefully in an open and courteous way by investigating the matters raised thoroughly and replying as quickly as possible.

1.1 National Museums NI has an internal two-stage complaints process. We will do all we can to resolve your complaint at the first stage, but if you are not satisfied with our response or you are unhappy with the way we have handled your complaint, you can request for your complaint to be escalated and reviewed. How to complain and details of our procedure are set out below along with how you can expect us to handle your complaint and the expected timeframes.

1.2 We will treat the individual(s) making a complaint impartially, in confidence and with respect and courtesy. No individual will be adversely treated because they have found cause to complain about our service(s).

## What do we consider to be a complaint?

2.1 National Museums NI regards a complaint as an expression of dissatisfaction by one or more members of the public, about a perceived failure by our organisation, or our delivery partners, to properly discharge any aspect of our service to an acceptable standard.

## Who can complain?

3.1 Anyone who receives, requests or is directly affected by or comes into contact with our services can make a complaint. Relatives or other representatives may complain on behalf of service users where they have been given authority to do so. This could be a family member, a carer, an advocate or an advisor, An elected representative such as a local Councillor, MLA or MP.

3.2 Anonymous complaints will be considered where there is sufficient information to enable investigation and where the issues raised indicate a significant service failure, governance concern or risk.

## Who do I complain to?

4.1 There are two ways by which you can formally complain. You can complete our complaint form which is available in hard copy, on request and on our website, or can be found in **Appendix 1** of this policy. This should be sent to The Contact Centre who will raise the issue directly with the manager responsible for that service.

The Contact Centre
National Museums NI
153, Bangor Road
Cultra
Holywood
Co. Down
BT18 OEU

If you prefer you can email your complaint to:
contactcentre@nationalmuseumsni.org

## Is there a time limit for complaining?

5.1 We will do all we can to look into your complaint as quickly as possible. In order to ensure that complaints are dealt with properly, we will not usually accept complaints that are made more than **6 months** after the event being complained about or being brought to our attention. If your complaint exceeds this period and your feel that the time limit is not applicable, please outline the reasons within your complaint.

## Are there matters that are not considered to fall under this process?

6.1 If you wish to comment on the performance or behaviour of an organisation associated with National Museums NI, you should raise it with that organisation, using its own complaints procedure.

6.2 Requests for information under the Freedom of Information Act 2000 (FOIA) or Subject Access Requests in accordance with UK GDPR legislation.

If you wish to make a Freedom of Information request or which to complain about how an information request has been handled, please write to:

The Information Manager
National Museums NI
153 Bangor Road
Cultra
Holywood
Co. Down

BT18 OEU

Or by email to foi@nationalmuseumsni.org

If you wish to submit a data subject access request, please write to:

The Data Protection Officer
National Museums NI
153 Bangor Road
Cultra
Holywood
Co. Down
BT18 OEU

Or by email to gdpr@nationalmuseumsni.org

## Expectations of Complainants

3.7 We recognise that people who complain may be distressed, frustrated or dissatisfied with our services. All complainants have the right to be heard and to have their concerns considered appropriately.

However, there may be occasions when the actions or behaviour of a complainant place unreasonable demands on our staff, resources or services. This policy sets out how we will manage such situations while ensuring that individuals continue to receive fair access to our complaints process.

If a complainant demonstrates unreasonable conduct in the manner in which they exercise their right to complain, we may initiate our Managing Unreasonable Complainant Conduct Policy **(see Appendix 2**).

This supporting policy focuses on unreasonable conduct and behaviour, not on the merits of the complaint itself. A complainant will never be considered unreasonable simply because they are persistent, assertive, critical of NMNI, or dissatisfied with an outcome.

## What happens with my complaint at Stage One ?

3.8 (i) Once you have made a complaint to National Museums NI in writing to The Contact Centre, we will send you an acknowledgement within **three working days of receipt**. That acknowledgement will provide an indication as to who will be responsible for responding to you and when you can expect to receive a reply.
(ii) If we cannot investigate your complaint, we will write to you explaining why. If possible, we will suggest another organisation that may be able to help you

if we cannot.
(iii) All complaints made on social media will be routed into the complaints procedure by the following routes; in person, by telephone, email, online complaint form or letter as dialoguing on public platforms can compromise privacy issues. The **three working days acknowledgement receipt** commences when it is routed through those formats.

3.9 We expect to respond to the majority of complaints within **5 working days of the complaint arriving with us**. The time taken to respond will vary depending on the complexity of the complaint. More complex matters involving the need to speak with part time staff may take longer to complete. However, if we are unable to respond within the 5 day timeframe because, for example, the matters you raise require more detailed investigation, we will inform you in writing.

3.10 We will give serious consideration to the issues you raise. Where we identify mistakes in our approach we will acknowledge those and this may include providing an apology, setting out details of next steps if applicable, and explaining what we will do to prevent the problem occurring again.

## What happens if I disagree with the outcome, or how my complaint was handled? (Stage Two)

3.11 We will make every effort to satisfactorily resolve your complaint in the first instance. However, if you are not satisfied by our response or by the way that your complaint was handled, you should confirm this by return and that you wish for a Stage 2 Investigation to be undertaken.

A stage 2 investigation will be overseen by a senior official who has had no prior involvement in the matter. You will need to outline why you are dissatisfied with the initial response.

3.12 (i) We will acknowledge the complaint within **three working days of receipt.**

(ii) Following acknowledgement, the Chief Operating Officer will arrange for the case to be reconsidered by a member of staff who was not previously involved in handling your complaint. This stage will involve a full independent review of the handling of your complaint and all associated papers. This may involve direct correspondence to the complainant seeking further clarification or information about the complaint.

(iii) The outcome of this investigation will be communicated to you in writing within **20 working days of the receipt of the complaint**, however if for any reason there is a problem with collating the response, we will inform you of the reason for a delayed response and will inform you of the expected date of reply.

## What can I do if I am still dissatisfied with the outcome of Stage Two?

4.1 If you remain dissatisfied following the outcome of Stage Two, you may contact the Northern Ireland Public Services Ombudsman's Office (NIPSO). National Museums NI falls under Schedule 3 of the Public Services Ombudsman Act (Northern Ireland) 2016.

4.2 NIPSO will expect you to exhaust our internal complaints process before they will accept your complaint. In addition your contact with the Ombudsman's Office must be done **within six months from the completion of our process**, although they may investigate a complaint outside this time limit if there are special circumstances that would make it proper to do so.

You can contact the Ombudsman in any of the following ways:

Northern Ireland Public Services Ombudsman
Progressive House
33 Wellington Place,
Belfast
BT1 6NN

Freephone: 0800 34 34 24

Freepost: Freepost NIPSO

Email: nipso@nipso.org.uk

Further details are available from the NI Public Services Ombudsman's website:

https://nipso.org.uk

## Equality and Diversity

4.3 We are a Section 75 complaint organisation, and as such, want our services to be accessible to all our stakeholders, regardless of age, disability, race or any other factor that may cause a disadvantage. To this end we strive to ensure that our services are accessible to all. If you encounter trouble submitting your complaint in writing we will aim to make reasonable adjustments to help you access this service, this includes:

- Providing access in our Administration Building for National Museums NI, 153 Bangor Road, Cultra, Co. Down, BT18 0EU
- Arranging to visit you in your home if you cannot visit our offices
- Arranging to make available interpretation or other communicative services if required

**National Museums NI Complaint Form**

**(Please complete in Capital Letters and in ink)**

## SECTION 1 – ABOUT YOU

Title: Mr/Mrs/Miss/Ms/Dr:

Surname:

Forename(s):

Address:

Postcode:

Telephone:

Email:

## SECTION 2 – ISSUE RAISED

**2a)** Which National Museums NI service does this complaint relate to?

Please give the name of the relevant staff member(s) you were dealing with – if appropriate?

**2b)** What issue would you like to report?

(Outline the background to the issue, when it occurred and give a brief description of what you think National Museums NI failed to do, or did wrongly. If there is not enough space here, please continue your comments on a separate piece of paper and attach it to the form. If possible, refer to any relevant letters you have written to National Museums NI, our responses and any other information you think relevant).

**2c)** How has it affected you?

(Describe how this has affected you or your interests)

**2d)** What would you regard as a reasonable remedy to the matter?

**2e)** If there has been a delay in telling/informing us about the issue, please state why.

## SECTION 3 – PRIOR ISSUE

Have you raised this issue previously with National Museums NI? (If yes and if possible please provide a copy of the response you received or alternatively provide some details).

**Signed:** _____ **Date**_____

**Appendix 2**

**Policy for Managing Unreasonable Complainant Conduct**

## 1. Policy Statement

National Museums NI is committed to delivering high quality services and to handling complaints fairly, thoroughly, consistently and transparently.

National Museums NI recognises that complaints provide valuable feedback and opportunities for organisational learning and improvement. National Museums NI is committed to ensuring that everyone has the right to raise concerns and have those concerns considered in accordance with the Northern Ireland Public Services Ombudsman Model Complaints Handling Procedure.

Individuals who raise concerns may be frustrated, distressed, angry or dissatisfied with the service they have received. National Museums NI will always seek to engage constructively and respectfully with complainants.

However, there may be occasions where the behaviour of a complainant places unreasonable demands on staff time, organisational resources or service delivery. This policy establishes a framework for managing such situations fairly and proportionately while ensuring continued access to the complaints process wherever reasonably possible.

This policy addresses unreasonable conduct and behaviour rather than the substance or validity of a complaint. A complainant will not be considered unreasonable simply because they are persistent, challenging, critical of National Museums NI, or dissatisfied with an outcome.

## 2. Purpose

The purpose of this policy is to:

- Provide a consistent framework for managing unreasonable complainant conduct.
- Support the effective operation of the complaints handling process.

- Protect the health, safety and wellbeing of employees, volunteers and contractors.
- Ensure public resources are used appropriately and efficiently.
- Enable National Museums NI to continue providing services fairly to all users.
- Ensure any restrictions placed upon communications or engagement are lawful, proportionate and justified.
- Promote a culture of respectful engagement between National Museums NI and members of the public.

**3. Scope**

This policy applies to all individuals who engage with National Museums NI through the complaints or other similar processes, including:

Visitors

Researchers

Members of the public

Service users

Stakeholders

Suppliers

Contractors

Representatives acting on behalf of a complainant

This policy applies to all forms of communication, including:

Face-to-face interactions.

Telephone calls.

Electronic mail.

Written correspondence.

Online communications.

Social media interactions directed towards National Museums NI.

Meetings and events.

## 4. Principles

National Museums NI will apply this policy in accordance with the following principles.

### 4.1 Fairness

Every complaint will be assessed and considered on its own merits.

### 4.2 Respect

All complainants will be treated with dignity, courtesy and respect.

### 4.3 Proportionality

Any action taken under this policy will be proportionate to the circumstances and the impact of the behaviour.

### 4.4 Accessibility

National Museums NI will consider reasonable adjustments where behaviour may be influenced by disability, mental health conditions, communication barriers, trauma or other relevant circumstances.

### 4.5 Transparency

Individuals will normally be informed where their behaviour is causing concern and will be given an opportunity to modify that behaviour before formal restrictions are introduced.

### 4.6 Accountability

Decisions made under this policy will be appropriately documented, authorised and reviewed.

## 5. Definition of Unreasonable Complainant Conduct

Unreasonable complainant conduct is behaviour which, because of its nature, frequency or impact, significantly affects National Museums NI's ability to:

1. Investigate complaints effectively
2. Deliver services to others
3. Protect staff wellbeing
4. Maintain a safe working environment
5. Use public resources responsibly

The behaviour of the complainant, rather than the subject matter of the complaint, is the determining factor.

## 6. Examples of Unreasonable Conduct

The examples below are intended as guidance and are not exhaustive.

### 6.1 Excessive Contact

Examples include:

- Repeated contact after a full response has been issued.
- Excessive telephone calls, electronic mail messages or letters.
- Contacting multiple members of staff about the same issue simultaneously.
- Sending substantial volumes of repetitive correspondence.
- Refusing to accept that a complaint has completed the complaints process.

### 6.2 Unreasonable Demands

Examples include:

- Demanding outcomes that are beyond the authority of National Museums NI.
- Insisting on unrealistic timescales.
- Requiring extensive investigations that are disproportionate to the issues raised.
- Making demands that would divert significant resources from the delivery of services.

**6.3 Unreasonable Persistence**

Examples include:

- Repeatedly raising the same issue after the complaints process has concluded
- Continually seeking reconsideration without presenting significant new evidence
- Introducing irrelevant matters that hinder resolution of the complaint.
- Refusing to identify the specific issue to be investigated.

6.4 Aggressive, Intimidating or Abusive Behaviour

Examples include:

Personal insults directed towards staff.

- Offensive language.
- Discriminatory remarks.
- Harassment.
- Intimidation.
- Threatening behaviour.
- Threats of physical harm.
- Physical aggression.
- Behaviour that causes staff to fear for their safety.

### 6.5 Unreasonable Methods of Engagement

Examples include:

- Refusing to comply with reasonable communication arrangements.
- Publishing unfounded allegations about employees.
- Harassing employees through social media.
- Recording meetings in circumstances that undermine constructive engagement.
- Repeatedly sharing misleading information after corrections have been provided.

## 7. Conduct That Will Not Normally Be Considered Unreasonable

The following behaviours will not normally be treated as unreasonable:

- Making a complaint.
- Making more than one complaint about unrelated matters.
- Expressing dissatisfaction with a service.
- Criticising decisions made by National Museums NI.
- Seeking clarification.
- Requesting a review through the appropriate complaints process.
- Being upset, distressed or emotional.
- Pursuing a complaint in a determined but reasonable manner.

## 8. Informal Management Measures

National Museums NI will seek to resolve concerns informally wherever possible.

Informal measures may include:

- Explaining the complaints process.
- Clarifying expectations.
- Explaining expected timescales.
- Providing a single point of contact.
- Setting out the limits of National Museums NI's powers and responsibilities.

- Agreeing an appropriate method of communication.

The aim of these measures is to support constructive engagement and avoid the need for formal restrictions.

## 9. Formal Restrictions

Where unreasonable conduct continues despite reasonable attempts to resolve the matter informally, National Museums NI may introduce restrictions.

Any restriction will be proportionate, reasonable and tailored to the circumstances.

### 9.1 Communication Restrictions

National Museums NI may:

- Require communication through a nominated officer.
- Restrict communication to a particular channel.
- Require correspondence to be made in writing.
- Limit the frequency of contact.

### 9.2 Correspondence Restrictions

National Museums NI may:

Decline to respond to repetitive correspondence that raises no new issues.

Acknowledge but not respond substantively to repetitive communications.

File correspondence without response where an issue has been fully addressed and no new information has been provided.

### 9.3 Meeting Restrictions

National Museums NI may:

- Limit attendance at meetings.
- Require more than one representative of National Museums NI to be present.
- End meetings where behaviour becomes abusive or threatening.
- Refuse requests for meetings where written communication is considered sufficient.

### 9.4 Access Restrictions

Where behaviour presents a risk to employees, volunteers, visitors, collections or property, National Museums NI may implement appropriate restrictions on access in accordance with organisational policies and legal obligations.

## 10. Authority to Apply Restrictions

Restrictions under this policy may only be approved by:

The Chief Operating Officer; or

Another senior officer authorised by the Chief Executive.

Decision makers must consider:

- The history of engagement with the complainant.
- The evidence supporting concerns regarding behaviour.
- Equality, accessibility and human rights considerations.
- Any reasonable adjustments that may be required.
- The proportionality of proposed restrictions.
- The continued ability of the individual to access services and the complaints process.

## 11. Notification

Where restrictions are imposed, National Museums NI will normally write to the individual setting out:

- The reasons for the decision.
- The behaviour that has led to the decision.
- The restrictions being applied.
- The date on which the restrictions will take effect.
- The period for which the restrictions will remain in place.
- The arrangements for review.

National Museums NI may impose immediate restrictions without prior warning where behaviour involves threats, serious abuse, harassment, intimidation or violence.

**12. Duration and Review**

Restrictions should not normally be permanent.

Restrictions will ordinarily be reviewed after:

- Six months for less serious cases; or
- Twelve months for serious or persistent cases.

The review will consider:

- Whether behaviour has improved.
- Whether restrictions remain necessary.
- Whether restrictions should be amended.
- Whether restrictions should be removed.

The outcome of each review will be recorded and communicated to the individual.

## 13. Complaints About the Application of This Policy

An individual may complain about the way this policy has been applied.

Any such complaint should, wherever possible, be reviewed by an officer who was not involved in the original decision.

The existence of a review request will not automatically suspend any restriction that has been imposed.

## 14. Record Keeping

National Museums NI will maintain appropriate records relating to:

- Behaviour that has caused concern.
- Informal interventions.
- Decisions to apply restrictions.
- Reviews of restrictions.
- Communications with the complainant.

Records will be maintained in accordance with records management requirements and data protection legislation.

## 15. Equality, Accessibility and Human Rights

National Museums NI recognises that behaviour may be influenced by disability, medical conditions, trauma, cultural factors, language barriers, mental health conditions or other personal circumstances.

Before restrictions are imposed, National Museums NI will consider:

- Equality obligations.
- Human rights considerations.
- Disability-related needs.

- Communication requirements.
- Reasonable adjustments.

Restrictions will only be applied where they remain necessary and proportionate after such considerations have been assessed.

## 16. Roles and Responsibilities

### Employees

Employees must:

- Treat complainants with respect and professionalism.
- Maintain accurate records.
- Escalate concerns regarding unreasonable conduct through management arrangements.

### Managers

Managers must:

- Support employees dealing with challenging situations.
- Ensure this policy is applied fairly and consistently.
- Maintain appropriate documentation.
- Consider staff welfare implications.

### Chief Operating Officer

The Chief Operating Officer is responsible for:

- Oversight of the policy.
- Monitoring consistency of application.
- Advising on significant cases.
- Reporting trends and significant issues where appropriate.

- Promoting a culture of fair and respectful complaint handling.
- Ensuring effective governance arrangements exist.
- Supporting employees who experience unreasonable conduct.

## Governance Note

The use of this policy should be exceptional. National Museums NI remains committed to openness, accountability and the right of individuals to raise concerns. Any restriction imposed under this policy must be demonstrably fair, necessary, proportionate and subject to regular review.

## Document Information

Version: 1.0

Policy Owner: Chief Operating Officer

Approved By: Senior Management

Review Frequency: Every three years or earlier if required by legislative, regulatory or organisational change

## Related Documents

- National Museums NI Complaints Policy
- Northern Ireland Public Services Ombudsman Model Complaints Handling Procedure
- National Museums NI Dignity at Work Policy
- National Museums NI Health and Safety Policy
- National Museums NI Data Protection Policy
- National Museums NI Social Media Conduct Policy
- National Museums NI Staff Code of Conduct

**Appendix A: Decision-Making Checklist**

Before applying restrictions, decision makers should confirm that:

☐ The complaint has been handled appropriately.

☐ The behaviour causing concern has been clearly evidenced.

☐ Informal measures have been considered or attempted where appropriate.

☐ Equality, accessibility and human rights considerations have been assessed.

☐ Reasonable adjustments have been considered.

☐ Proposed restrictions are proportionate.

☐ Access to the complaints process remains available where appropriate.

☐ A review date has been established.

☐ The decision has been documented and approved by an authorised officer.

☐ The rationale for the decision is capable of withstanding external scrutiny by the Northern Ireland Public Services Ombudsman, the Department for Communities or other oversight bodies.