

King's and Lord
Treasurer's Remembrancer

The background features a collage of images: a classical building with a dome and columns, a close-up of ancient stone artifacts in a grassy field, and a large, faint watermark of the Royal Coat of Arms. The design is accented with purple geometric shapes.

KLTR Complaints & Feedback Policy

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1. Our commitment

1. We recognise that in helping us to deliver our functions most effectively it is important to listen to those who are, or have been, affected by the work that we do and, in turn, the service we provide.
2. We want to hear about your experience of dealing with the KLTR Office, or the Treasure Trove Unit, whether it is good or bad, or how you have otherwise been affected by our service. We can learn from your experience.
3. We will try to resolve complaints to the satisfaction of the person complaining wherever this is possible. Where this isn't possible, we will give the person a clear response to each of their points of complaint. We will always try to respond as quickly as possible.
4. We are committed to:
 - giving the public and external organisations the opportunity to comment on the service the KLTR Office and the Treasure Trove Unit provide, including our policies, systems and procedures;
 - listening to those we deal with and recording their feedback;
 - responding to complaints in a timely and helpful manner; and
 - using feedback to inform changes and improvements, as appropriate, so that the KLTR delivers a better service.

2. What constitutes feedback

5. Feedback is any complaint, comment, compliment or suggestion from the public and external organisations regarding the work of, and/or the service provided by, the KLTR Office or the Treasure Trove Unit.
6. Specifically, a complaint is any written or spoken expression to the KLTR Office or Treasure Trove Unit of dissatisfaction with the service provided.
7. The KLTR Office welcomes and values feedback. We aim to deliver a high standard of service. Feedback, both positive and negative, including complaints, can provide valuable insight into the public perception of the service we provide.

3. KLTR response to feedback

8. We will regularly analyse all feedback which will help us to improve our service. We will also monitor the operation of this policy periodically.

4. How to provide feedback and make a complaint

9. You should contact us **as soon as possible after the matter you wish to complain about occurs or during its occurrence.**
10. Please indicate on all correspondence that you are making a formal complaint.

If your matter relates to the **KLTR**:

- **email** ChiefExecutiveOffice@kltr.gov.uk or
- **write** to:

KLTR Department
Scottish Government Building
1F North
Victoria Quay
Edinburgh
EH6 6QQ

If your matter relates to the **Treasure Trove Unit** or the **Scottish Archaeological Finds Allocation Panel (SAFAP)**:

- **email** treasuretrove@nms.ac.uk or
- **write** to:

Treasure Trove Unit
c/o National Museums Scotland
Chambers Street
Edinburgh
EH1 1JF

11. Complaints regarding treasure trove will be handled by the Treasure Trove Unit who sit within the National Museums Scotland and/or senior management in the National Museums Scotland depending on the nature of the complaint, with input from KLTR, as appropriate. They will follow this complaints policy.
12. In your approach please provide:
 - 12.1 your full name and contact details.
 - 12.2 details of anyone at the KLTR Office, Treasure Trove Unit or elsewhere, as appropriate, whom you have already contacted regarding your complaint.
 - 12.3 if you are making a complaint about a particular case, information to identify the case and details as to why you are dissatisfied and



the outcome you are seeking. If possible, please provide the case reference which will usually be contained in the subject line of an email or as a reference at the top right-hand side of a letter and begin BV/, TT/, or UH/.

13. We are committed to making our services as accessible as possible. Please let us know if you would like to receive this information in another form and we will endeavour to assist you.

5. Can someone make a complaint on my behalf?

14. You can nominate someone else to make a complaint for you. You will need to give permission in writing that you wish for someone else to make the complaint on your behalf and that you authorise us to discuss the matter with them. We will need to be satisfied that the person has your explicit permission to act on your behalf and for us to share your data with that person.

6. Complaints Procedure

15. There are two stages to our Complaints Procedure.

Stage 1

16. Following receipt of your complaint with the information requested in paragraph 12, Section 4 above, we may seek clarification on some points and ask you for further information. Once we have the necessary information we will aim to resolve your complaint within five working days.
17. If appropriate, we may pass your complaint to another department who may be better placed to deal with it. If so, we will make you aware of this.
18. KLTR will escalate any complaint to Stage 2 if we believe the complaint would benefit from further investigation and will inform you of this. If you are dissatisfied with the response provided under the Stage 1 Procedure, it will likely progress to the Stage 2 Procedure as described in the next section.

Stage 2

19. If we are unable to resolve your complaint within five working days under Stage 1, we will immediately refer your complaint to this Stage. This typically happens in cases which are more complex or serious and require more in-depth investigation. Stage 2 will also be used if you are dissatisfied with our response at Stage 1.
20. You are not required to provide any further information when a complaint goes through the Stage 2 procedure. We will contact you if we would like additional information.



21. We aim to acknowledge receipt of your complaint within 3 working days and provide you with a full response within 20 working days. If we are unable to provide a full response, we will keep you informed of progress within 20 working days of receipt of your complaint, and regularly thereafter, until a decision is issued.

7. Complaints relating to the Ownerless Property Transfer Scheme (OPTS)

22. Complaints about the outcome of any OPTS processes, including a decision on whether or not to transfer a property under the Scheme, should be made as soon as possible, as the KLTR will still be considering all options available, including disposal or disclaimer (which are irrevocable steps).
23. Please note that the decision of the KLTR on OPTS applications is final. Using the general KLTR complaints process is not a formal appeals procedure - it cannot be used as a way to ask the KLTR to reconsider his decision.
24. However, the KLTR will, where requested, review the process used to make the decision about a particular application, and consider the evidence that was used to arrive at the decision. We will consider whether we have followed our advertised procedure and whether we have taken into account all relevant information relating to a particular application.
25. As advertised in the OPTS documentation, those involved in making decisions on OPTS applications are very happy to provide additional feedback to applicants, whatever the outcome of their application.
26. The OPTS is a new scheme aimed at bringing ownerless properties back into productive use for the benefit of the public. Feedback on our processes and procedures is particularly welcome so that the Scheme can help applications to maximise opportunities.

8. Time limit for making a complaint

27. Complaints should be made as soon as possible, and, in any event, within 6 months of the matter complained of having occurred. We will usually decline to deal with complaints made outside this 6-month window unless there are special circumstances for considering complaints beyond this time (for example, where a person was not able to complain due to serious illness).
28. We will apply these time limits with discretion, taking into account the seriousness of the issue, the availability of relevant records and staff involved, how long ago the events occurred, and the likelihood that an investigation will lead to a practical benefit for the person or useful learning for the organisation.

9. When we may not deal with your complaint

Unacceptable actions

29. The KLTR Office and the Treasure Trove Unit may refuse to deal with complaints received from customers whose actions or behaviour we consider unacceptable. Our staff have the right to a safe working environment.
30. We do not view behaviour as unacceptable just because a customer is forceful or determined. Actions considered to be unacceptable are grouped under the following three headings:
 - Aggressive or abusive behaviour.
 - Unreasonable demands.
 - Unreasonable persistence.
31. We may consider a customer to be making unreasonable demands or as being unreasonably persistent because of the amount of information they seek, the nature and scale of service they expect or the number of approaches they make.

Aggressive or abusive behaviour

32. Examples of behaviour under this heading include threats, physical violence, verbal abuse, swearing, derogatory remarks and general rudeness. We also consider that inflammatory statements and unsubstantiated allegations can be abusive behaviour.

Unreasonable demands

33. Examples of actions under this heading include demanding responses within unreasonable timescales, insisting on seeing or speaking to a particular member of staff, continual emails, phone calls or letters, and repeatedly changing the substance of the complaint or raising unrelated concerns.
34. Demands considered to be unacceptable and unreasonable will not be pursued by the KLTR Office.

Unreasonable persistence

35. Examples of unreasonable persistence include persistent refusal to accept a decision made in relation to a complaint, persistent refusal to accept explanations relating to what the KLTR Office can or cannot do, and to continue to contact us without presenting any new information.

Managing unacceptable actions

36. Where someone's behaviour falls into any of the above categories considered unacceptable, we may take action as we consider appropriate including: informing them that no further action will be taken in response to their complaint; or advising them that only new or substantive issues will receive further response.

Scottish Public Services Ombudsman

37. If you are unhappy with how the KLTR has handled your complaint, you can raise the matter with the Scottish Public Services Ombudsman (SPSO). The SPSO is the final stage for complaints about most organisations providing public services in Scotland. Their service is independent, free, and confidential. The SPSO will decide whether your complaint has grounds for investigation.
38. The SPSO has the power to investigate alleged maladministration. The SPSO has no role in examining how and why legal decisions were taken but can examine how we have handled a complaint.
39. The SPSO cannot normally look at complaints more than 12 months after you became aware of the matter you want to complain about.
40. You may contact the SPSO directly at:

Address: SPSO
Freepost EH641
Edinburgh
EH3 0BR

or

SPSO
4 Melville Street
Edinburgh
EH3 7NS

Telephone: 0800 377 7330
Email: ask@spsso.org.uk
Web: www.spsso.org.uk