



The Scottish Parliament
Pàrlamaid na h-Alba

The Model Complaints Handling Procedure for the Scottish Parliamentary Corporate Body (SPCB) Part 4: Governance

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Roles and responsibilities

1. All staff will be aware of:
 - the Complaints Handling Procedure (CHP)
 - how to handle and record complaints at the frontline response stage
 - their clear authority to attempt to resolve any complaints they may be called upon to deal with
 - who they can refer a complaint to, in case they are not able to handle the matterand
 - the need to try and resolve complaints early and as close to the point of service delivery as possible.
2. Training on this procedure will be part of the induction process for all new staff. Refresher training will be provided for current staff on a regular basis.
3. Senior management will ensure that:
 - the SPCB's final position on a complaint investigation is signed off by an appropriate manager or officer in order to provide assurance that this is the definitive response of the SPCB and that the complainant's concerns have been taken seriously
 - it maintains overall responsibility and accountability for the management and governance of complaints handling (including complaints about contracted services)
 - it has an active role in, and understanding of, the CHP (although not necessarily involved in the decision-making process of complaint handling)
 - mechanisms are in place to ensure a consistent approach to the way complaints handling information is managed, monitored, reviewed and reported at all levels; and
 - complaints information is used to improve services, and this is evident from regular publications.
4. The Clerk/Chief Executive of the Scottish Parliament provides leadership and direction in ways that guide and enable us to perform effectively across all services. This includes ensuring that there is an effective CHP, with a robust investigation process that demonstrates how we learn from the complaints we receive. The Clerk/Chief Executive of the Scottish Parliament may take a personal interest in all or some complaints, or may delegate responsibility for the CHP to senior staff. Regular management reports assure the Clerk/Chief Executive of the quality of complaints performance.

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5. The Clerk / Chief Executive is also responsible for ensuring that there are governance and accountability arrangements in place in relation to complaints about contractors. This includes:
 - ensuring performance monitoring for complaints is a feature of the service/management agreements between the SPCB and contractors
 - setting clear objectives in relation to this complaints procedure and putting appropriate monitoring systems in place to provide the SPCB with an overview of how the contractor is meeting its objectives
 6. **Group heads or Office Heads/Team Leaders:** On the Clerk/Chief Executive's behalf, group heads may be responsible for:
 - managing complaints and the way we learn from them
 - overseeing the implementation of actions required as a result of a complaint
 - investigating complaints; and
 - deputising for the Clerk/Chief Executive on occasion.
 7. The Group Heads will decide if they or an Office Head / Team Leader will be responsible for preparing and signing off decisions on complaints. Whoever leads should be satisfied that the investigation is complete and their response addresses all aspects of the complaint. However, group or office heads may decide to delegate some elements of complaints handling (such as investigations and the drafting of response letters) to other senior staff. Where this happens, group or office heads should retain ownership and accountability for the management and reporting of complaints.
 8. **Complaints investigator:** The group / office head/team leader whose team is tasked with responding to the complaint will allocate a staff member to be the complaints investigator, who will be responsible and accountable for the management of the investigation. This may include preparing a comprehensive written report, including details of any procedural changes in service delivery and identifying wider opportunities for learning across the organisation. Wherever possible, complaints should be investigated by someone not involved in the complaint (for example, a manager from a different business area). The complaints investigator will be supported by the Public Information team.
 9. **Human Resources:** The HR Office is responsible for ensuring procedures are in place for all new staff to receive training on the CHP as part of the induction process, and for refresher training to be provided for current staff on a regular basis.
 10. **The SPCB's SPSO liaison officer:** Our SPSO liaison officer's role will include providing complaints information in an orderly, structured way within requested timescales, providing comments on factual accuracy on our behalf in response to SPSO reports, and confirming and verifying that recommendations have been implemented.

Recording, reporting, learning from and publicising complaints

11. Complaints provide valuable customer feedback. One of the aims of the CHP is to identify opportunities to improve services across the SPCB. By recording and analysing complaints data, we can identify and address the causes of complaints and, where appropriate, identify training opportunities and introduce service improvements.
12. We also have arrangements in place to ensure complaints about contractors are recorded, reported on and publicised in line with this CHP.

Recording complaints

13. It is important to record suitable data to enable us to fully investigate and respond to the complaint, as well as using our complaint information to track themes and trends. As a minimum, we should record:
 - the complainant's name and contact details (In line with data protection principles, contact details should be recorded only if the complaint has not been resolved satisfactorily on the spot.)
 - the date the complaint was received
 - the nature of the complaint
 - the service the complaint refers to
 - the staff member responsible for handling the complaint
 - action taken and outcome at frontline response stage
 - date the complaint was closed at the frontline response stage
 - date the investigation stage was initiated (if applicable)
 - action taken and outcome at investigation stage (if applicable)
 - date the complaint was closed at the investigation stage (if applicable); and
 - the underlying cause of the complaint and any remedial action taken.
 - the outcome of the SPSO's investigation (where applicable).
14. If the customer does not want to provide any of this information, we will reassure them that it will be managed appropriately, and record what we can.
15. Individual complaint files will be stored in line with our document retention policy. This means that documentation related to individual complaints will be retained for no more than two years.

Learning from complaints

16. We must have clear systems in place to act on issues identified in complaints. As a minimum, we must:

- seek to identify the root cause of complaints
- take action to reduce the risk of recurrence; and
- systematically review complaints performance reports to improve service delivery.

17. Learning may be identified from individual complaints (regardless of whether the complaint is upheld or not) and from analysis of complaints data.

18. Where we have identified the need for service improvement in response to an individual complaint, we will take appropriate action. The process for learning from complaints should include the following:

- the action needed to improve services must be authorised by an appropriate manager
- an officer (or team) should be designated the 'owner' of the issue, with responsibility for ensuring the action is taken
- a target date will be set for the action to be taken
- the designated individual must follow up to ensure that the action is taken within the agreed timescale
- where appropriate, performance in the service area should be monitored to ensure that the issue has been resolved; and
- any learning points should be shared with relevant staff.

19. SPSO has guidance on [Learning from complaints](#).

20. Leadership Group will review the information reported on complaints regularly to ensure that any trends or wider issues which may not be obvious from individual complaints are quickly identified and addressed. Where we identify the need for service improvement, we will take appropriate action (as set out above). Where appropriate, performance in the service area should be monitored to ensure that the issue has been resolved.

Reporting of complaints

21. We have a process for the internal reporting of complaints information, including analysis of complaints trends. Regularly reporting the analysis of complaints information helps to inform management of where services need to improve.

22. We report **quarterly** to Leadership Group and the SPCB on:

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- performance statistics, in line with the complaints performance indicators published by SPSO
 - analysis of the trends and outcomes of complaints (This will include highlighting relevant areas where few or no complaints are received, which may indicate either good practice or that there are barriers to complaining in that area.)

Publicising complaints information

23. We publish on [our website](#) on a **quarterly** basis information on complaints outcomes and actions taken to improve services.

24. This demonstrates the improvements resulting from complaints and shows that complaints can help to improve our services. It also helps ensure transparency in our complaints handling service and will help to show our customers that we value their complaints.

25. We will publish an **annual** complaints performance report on our website in line with SPSO requirements, and provide this to the SPSO on request. This summarises and builds on the quarterly reports we have produced about our services. It includes:

- performance statistics, in line with the complaints performance indicators published by the SPSO; and
- complaint trends and the actions that have been or will be taken to improve services as a result.

These reports must be easily accessible to members of the public and available in alternative formats if requested.