

**THE SCOTTISH HIGHER EDUCATION
MODEL COMPLAINTS HANDLING PROCEDURE (CHP)**

EDINBURGH NAPIER UNIVERSITY ADAPTATION

PART 4 of 4: GOVERNANCE



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1. **Roles and Responsibilities**

CP4.1 All staff are made aware of:

- the Complaints Handling Procedure (CHP)
- how to handle and record complaints at the frontline response stage
- who they can refer a complaint to, in case they are not able to handle the matter
- the need to try and resolve complaints early and as close to the point of service delivery as possible
- their clear authority to attempt to resolve any complaints they may be called upon to deal with.

CP4.2 Training on this procedure is part of the induction process for all new staff. Refresher communications are provided to current staff on a regular basis.

CP4.3 Senior management ensure that:

- our final position on a complaint investigation is signed off by an appropriate manager or officer in order to provide assurance that this is our definitive response and that the complainant's concerns have been taken seriously
- they maintain overall responsibility and accountability for the management and governance of complaints handling (including complaints about contracted services)
- they have 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
- complaints information is used to improve services, and this is evident from regular publications.

CP4.4 *The University's Principal* 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 Complaints Handling Procedure, with a robust investigation process that demonstrates how we learn from the complaints we receive. Regular management reports assure the Senior Leadership Team of the quality of complaints performance.

CP4.5 The Principal 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 University and contractors
- setting clear objectives in relation to this complaints procedure and putting appropriate monitoring systems in place to provide the University with an overview of how the contractor is meeting its objectives.

- CP4.5** *Deans of School, Directors of Service and other senior managers* may be involved in the operational investigation and management of complaints handling. As senior officers they may be responsible for preparing and signing decision letters to complainants, so they should be satisfied that the investigation is complete and their response addresses all aspects of the complaint.
- CP4.6** *Complaints investigators* are responsible and accountable for the management of investigations. They are appointed by Deans of School and Directors of Service. Their role includes fact gathering, interviewing, preparing a comprehensive written report, including details of any procedural changes in service delivery and identifying wider opportunities for learning across the institution.
- CP4.7** *The Learning and Development team* are responsible for ensuring all new staff receive training on the CHP as part of the induction process.
- CP4.8** *The Appeals, Complaints and Conduct Manager (ACCM)* provides anyone using the CHP (whether this is to make a complaint or handle a complaint submitted) with advice and guidance. The ACCM is also responsible for recording and reporting complaints and sending regular communications in relation to this and reminders of the procedure in general to a network of contacts across the University for dissemination to their colleagues.
- CP4.9** The ACCM will also act as the University's SPSO liaison officer. This may 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.
- CP4.10** Each School and Service of the University has a *Complaints Contact*. They will, upon a quarterly prompt from the ACCM, collate detail of their area's complaints for that quarter and send to the ACCM by the stated deadline to allow for the quarterly statistical report and commentary for Senior Leadership Team to be compiled and distributed by the ACCM.

2. Recording, reporting, learning from and publicising complaints

- CP4.11** Complaints provide valuable feedback. One of the aims of the CHP is to identify opportunities to improve services across the University. 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.
- CP4.12** We also have arrangements in place to ensure complaints about contractors are recorded, reported on and publicised in line with our CHP.

a. *Recording complaints*

CP4.13 We 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. We will record the following:

- the complainant's name and contact details
- the date the complaint was received
- the nature of the complaint
- the School/Service the complaint refers to
- 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)
- the underlying cause of the complaint and any remedial action taken.
- the outcome of the SPSO's investigation (where applicable)

CP4.14 If the complainant does not want to provide any of this information, we will reassure them that it will be managed appropriately, and record what we can.

CP4.15 Individual complaint files will be stored in line with our document retention policy.

b. *Learning from complaints*

CP4.16 We have clear systems in place to act on issues identified in complaints. This allows us to undertake the following (this list is not exhaustive):

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

CP4.17 Learning may be identified from individual complaints (regardless of whether the complaint is upheld or not) and from analysis of complaints data.

CP4.18 Where we have identified the need for service improvement in response to an individual complaint, we will take appropriate action. The complaint investigator will advise the relevant Dean of School or Director of Service of the details and they will then appoint a member of staff to implement the learning and work with them on a plan to do this.

CP4.19 SPSO has guidance on [Learning from complaints](#).

CP4.20 Senior management 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 in CP4.18. Where appropriate, performance in the service area will be monitored to ensure that the issue has been resolved.

c. *Reporting of complaints*

CP4.21 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.

CP4.22 Quarterly reports are sent to the Senior Leadership Team and an annual report is presented to University Court detailing:

- performance statistics, in line with the complaints performance indicators published by SPSO
- analysis of the trends and outcomes of complaints

d. *Publicising complaints information*

CP4.23 On a **quarterly** basis information on complaints outcomes and actions taken to improve services is reported to Senior Leadership Team.

CP4.24 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 that we value complaints.

CP4.25 We 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;
- complaint trends and the actions that have been or will be taken to improve services as a result.

CP4.26 These reports can be made available in alternative formats upon request.