

1.5.5 Complaints Handling Procedure Part 4: Governance

1.0 Roles and responsibilities

1.1 All staff will be 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 (contact complaints@glasgowclyde.ac.uk)
- the need to try and resolve complaints early and as close to the point of service delivery as possible; and
- their clear authority to attempt to resolve any complaints they may be called upon to deal with.

1.2 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.

1.3 Senior Management will ensure that:

- Glasgow Clyde College's final position on a complaint investigation is signed off by an appropriate manager in order to provide assurance that this is the definitive response of Glasgow Clyde College 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 in Glasgow Clyde College; and
- complaints information is used to improve services, and that this is evident from regular publications.

1.4. Principal/Chief Executive

1.4.1 The Principal/Chief Executive 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 Principal/Chief Executive of the quality of complaints performance.

1.4.2 The Principal/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 Glasgow Clyde College and contractors; and
- setting clear objectives in relation to this Complaints Handling Procedure and putting appropriate monitoring systems in place to provide Glasgow Clyde College with an overview of how the contractor is meeting its objectives.

1.5 Deputy Principal

1.5.1 The Deputy Principal deputises for the Principal/Chief Executive in relation to complaints handling; by overseeing the overall management of the CHP and the way we learn from complaints.

1.5.2 The Deputy Principal is responsible for ensuring the investigation of complaints; confirming the retention of comprehensive records of investigations and identifying details of any procedural changes in service delivery and/or wider opportunities for learning across the organisation. This role will be carried out alongside other Assistant Principals; however, the Deputy Principal will retain ownership and accountability for the overall management and reporting of complaints.

1.6 Assistant Principals

1.6.1 Assistant Principals are responsible for ensuring the investigation of complaints at Stage 2 including making certain that any conflict of interest is declared and managed. This will include guaranteeing the retention of comprehensive records of investigations and identifying details of any procedural changes in service delivery and/or wider opportunities for learning across the organisation.

1.6.2 Assistant Principals may also be involved in the operational investigation of Stage 2 complaints.

1.7 Complaint investigator

1.7.1 A Complaint Investigator is a member of staff delegated by an Assistant Principal to investigate and coordinate all aspects of a Stage 2 response to a complaint. 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.

1.7.2 Complaint Investigators will signpost staff member(s) who have been complained about to a contact person who can provide support and information on what to expect from the complaint process (this must not be the person investigating/ signing off the complaint response).

1.8 Organisational Development

- 1.8.1 The Organisational Development team are responsible for ensuring all new staff receive training on the Complaints Handling Procedure as part of the induction process, and that refresher training is available for current staff on a regular basis.

1.9 Quality Enhancement Manager

- 1.9.1 The Quality Enhancement Manager acts as the College Complaint Handler in ensuring that complaints received are designated, investigated and responded to in accordance with this CHP, including coordinating the retention of comprehensive records of all complaints received and responded to.
- 1.9.2 The Quality Enhancement Manager will be responsible for contacting complainants to agree points of complaint and outcome sought, where this is not clear, and then confirming understanding of these with the customer when acknowledging a Stage 2 complaint.
- 1.9.3 The Quality Enhancement Manager will prepare comprehensive written reports for Senior Management:
- Monthly: regarding general complaint performance within their operational areas throughout the previous month.
 - Quarterly: including performance statistics, in line with the performance indicators published by SPSO as well as analysis of the trends and outcomes of complaints.
 - Annually: on complaints performance, summarising and building on the quarterly reports produced, including performance statistics, complaint trends and actions that have been or will be taken to improve services as a result. This report will be published on Glasgow Clyde College's website.
- 1.9.4 The Quality Enhancement Manager will also act as the SPSO Liaison in providing complaints information in an orderly, structured way within requested timescales, providing comments on factual accuracy on Glasgow Clyde College's behalf, in response to SPSO reports, and confirming and verifying that recommendations have been implemented.

2.0 Recording, reporting, learning from and publicising complaints

- 2.1 Complaints provide valuable customer feedback. One of the aims of the Complaints Handling Procedure is to identify opportunities to improve services across Glasgow Clyde College. 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.
- 2.2. We also have arrangements in place to ensure complaints about contractors are recorded, reported on and publicised in line with this Complaints Handling Procedure.

2.3 Recording complaints

2.3.1 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:

- customer's name and contact details;
- date the complaint was received;
- nature of the complaint;
- service the complaint refers to;
- staff member responsible for responding to 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 Investigation Stage (if applicable);
- underlying cause of the complaint and any remedial action taken; and
- outcome of the SPSO's investigation (if applicable).

2.3.2 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.

2.3.3 Individual complaint files will be retained by the Quality Department and stored in line with our document retention policy. In deciding how long to keep complaint files, consideration should be given to the timescales involved in an SPSO investigation (in the event of SPSO review, we need to be able to produce records of how we investigated the complaint).

2.3.4 It is good practice to record the full journey of a complaint, as this allows us to use the information to identify good practice or areas for improvement. For example, where there are a high number of complaints 'not upheld' by the Glasgow Clyde College but then 'upheld' by the SPSO, this could suggest that there are opportunities to improve complaints handling at a local level.

2.4 Learning from complaints

2.4.1 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.

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

2.4.3 Where we have identified the need for service improvement in response to an individual complaint, we will take appropriate action.

2.4.4 The process for learning from complaints, should meet the following minimum standard:

- the action needed to improve services must be authorised by an appropriate manager;
- a designated individual (or team) should be designated the 'owner' of the issue, with responsibility for ensuring the action is taken;
- a target date must 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.

2.4.5 SPSO has guidance on [Learning from Complaints](#).

2.4.6 Senior Management 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.

2.5 Reporting of complaints

2.5.1 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.

2.5.2 We will report at least quarterly to Senior Management on:

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

2.6 Publicising complaints information

2.6.1 We publish on a quarterly basis information on complaints outcomes and actions taken to improve services.

2.6.2 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.

- 2.6.3 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 complaint 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.
- 2.6.4 These reports must be easily accessible to members of the public and available in alternative formats as requested.