

**Q1: Is there anything you would like to see added or changed in terms of the content of the principles? If yes, please indicate which principles and provide details.**

## HEALTH SECTOR

Organisation name	Response
Northern Ireland Ambulance Service	NIAS agrees with all six principles.
Southern Health & Social Care Trust – email submission	As a public body the Trust seeks to apply these principles in the handling of complaints. There are occasions, however when issues are raised via the complaints procedure for which that procedure is not the correct vehicle to allow resolution. In such cases it is difficult to apply principles 1 and 3 as we are not starting off right nor are we able to focus on what matters.
Southern Health & Social Care Trust – online submission	Statement of Principles SHSCT is committed to a complaints process that is straightforward, fair and time bound. The Trust acknowledges the six key principles which should be followed when handling complaints i.e.: 1. Start off right 2. Fix it early 3. Focus on what matters 4. Be fair 5. Be honest 6. Learn and improve. As a public body the Trust seeks to apply these principles in the handling of complaints. There are occasions, however, when issues are raised via the complaints procedure for which that procedure is not the correct vehicle to allow resolution. In such cases it is difficult to apply principles 1 and 3 as we are not starting off right, nor are we able to focus on what matters. We see in the document that NIPSO believes that complaints handling principles should contain an agreed definition of what is and what is not a complaint. It would be helpful also if the Statement of Principles/Model Procedures could provide guidance on action to be taken by the Trust in circumstances when the issue does not meet the definition of a complaint but there are ongoing recurring contacts by the complainant. This would assist the Trust when engaging with the public, regarding the most appropriate next steps.
Health & Social Care Board	The HSCB broadly welcomes the Statement of Principles outlined within the consultation document, and feels that many of these arrangements are already embedded within the HSC Complaints Procedure. There are a few comments we would wish to make: - <b>Principle 1 – ‘Start off right’</b>

	<p>To note that 'Manage complainant's expectations' is listed in the 'Statement of Principles' appendix but is not included in the bullet points contained within this section of the Consultation Document.</p> <p>In relation to managing complainant's expectations the HSCB would comment that para 62 in the Draft Model Complaints Handling Procedure – 'Closing the complaint at investigation stage' refers to informing the complainant of the complaint outcome (whether it is resolved, upheld, partially upheld or not upheld). The HSC system deals with issues that in many cases are not definitive, determinable or resolvable, and cannot be recorded as upheld or partially upheld such as waiting lists, treatment and care, treatment outcome and which may often be based on different perceptions of events and occurrences: two of the highest categories of complaints relate to staff attitude/behaviour and communication/information.</p> <p>A complainant's expectation can range from their own circumstances being changed as they believe they have in some way been wronged; receiving an apology for this; to ensuring that what they have experienced is not experienced by others; or possibly a combination of all of these; but their complaint may still not be 'upheld.'</p> <p>The HSCB understands the premise of managing a complainant's expectation, but they will seek to know the likelihood of a positive and definitive outcome and in health and social care that is more difficult to determine. Emphasis within the HSC Complaints Procedure is on learning from complaints and ensuring that where policy or procedure changes to reduce the risk of recurrence.</p> <p><b>Principle 2 – 'Fix it early'</b></p> <p>The HSCB would be of the view that 'proportionate remedies' may infer some type of monetary resolution to the complaint which we feel would not be appropriate for frontline staff when handling complaints 'on the spot' to consider.</p> <p><b>Principle 3 – 'Focus on what matters'</b></p> <p>The HSCB would advocate the full engagement of the complainant and where appropriate family engagement in the complaints handling arrangements, in an effort to ensure the complainant (and family) is at 'the heart of the process.' The HSCB would suggest that there should be some direct reference to family engagement in these principles.</p>
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NHS	That the patient doesn't get attacked.
Woodbrooke Medical Practice	<p>Learn &amp; Improve principle - I note the requirement to 'regularly publish complaint outcomes'; clarification is required on how frequently this will be and in what format.</p> <p>- It is not clear if HSCB will publish this information collectively on behalf of all practices or if surgeries be required to publish complaint outcomes individually</p>
HSC Trust Complaints Forum	Accept principles - these would be similar to the existing HSC Complaints Procedure standards/principles.
Patient Client Council	<p>The production of a Statement of Principles, which seeks to set out the basic principles underpinning the handling of complaints by all public bodies is widely acknowledged as a positive move. It is hoped that the key principles will embed a framework for acknowledging the experience of the complainant whilst instilling a culture of learning and development across organisations. The principles provide a welcome framing of complaints processes from a person-centred and quality improvement perspective rather than a focus on protecting organisations, which can be often be the perception of complainants.</p> <p>In relation to Principle 2 'Fix it early' – 'Provide an apology, where appropriate'; it is the PCC's experience from its complaints and advocacy work that people respond more positively if someone apologises well and fully. However, in Northern Ireland, saying "sorry" is often perceived as an admission of guilt. The caveat, in the model, 4 of 'where appropriate' could be ambiguous and may delay a process whilst it is determined whether or not an apology should be received by the complainant. Furthermore, failure to apologise can add to the distress on behalf of a complainant and can be a barrier to the resolution of an issue. We welcome the suggestion in the proposals regarding the introduction of a Duty of Candour (2021) for the inclusion of a provision which clarifies that an apology should not, of itself, amount to an admission of negligence or a breach of a statutory duty and would suggest that the same might be considered within the Model of Complaints Handling.</p> <p>In relation to Principle 3 'Focus on what matters' - 'Inform complainants when timescales cannot be met'; the insertion of an explanation as to 'why' timescales cannot be met would be most informative to the complainant. In our advocacy work with those who have an issue with services, and in our engagement with the public regarding the suggested Complaints Handling Standards, communication has consistently been highlighted as key within complaints processes, both in terms of flexibility in the methods of communication, the tone of communications and the frequency of communication regarding the process, even when no update is available.</p> <p>The PCC has an independent advocacy role across health and social care which seeks to support individuals in addressing issues, navigating systems and making clear the substance of their complaint. We recognise that advocacy organisations play an important role in supporting the public and that many operate across the public sector. The reference to 'signpost to advocacy and support services, where appropriate' within the model is therefore welcome.</p>

	<p>However, it is important in ‘recognising that some complainants might need extra help to complain’, that this extra help may need to be independent of the organisation to which the complainant is complaining, and that provision for this is made within the model i.e. in the form of signposting to external advocacy support and in noting the place of advocacy support in a complaints process. A framework that will allow organisations to seek clarification from the client about the substance and detail of their complaint would also be welcome.</p> <p>It is further suggested that a matrix for determining the level of complexity of the complaint at the outset would help in assessing realistic timescales for the investigation. Complaints involving a number of events, individuals or departments can increase the complexity of a complaint, with subsequent impact on timescales for response. Similarly, it has been our experience that complainants may not always be aware that there are multiple staff or departments involved in a complaints process, in particular within large and complex systems such as health and social care. Encouraging public bodies to outline the processes and structures involved in responding to complaints would align with the principles and values of transparency, but also prevent further distress to the complainant navigating a system with which they are unfamiliar. It would also be helpful for procedures to identify how an interface complaint can be managed, for example when a client wishes to complain about separate public bodies, relating to the same event or experience.</p>
General Medical Council	Based on our experience and expertise we have published our Good Investigation Principles, which can be found <a href="#">here</a> . These are the key principles that we believe should underpin investigations into concerns about fitness to practise.
Medical Protection Society	MPS does not have any suggested changes or additions.
HSC Trust	These would be similar to the existing HSC Complaints Procedure standards/principles.
CHASNI	Continuous engagement at all stages with the complainant.
Northern Health & Social Care Trust	This is reflective of the Trust approach and I would fully support the set of principles as outlined.

## EDUCATION SECTOR

Organisation name	Response
Spires Integrated Primary School	No comment on SOP
Belfast Metropolitan College	No comment on SOP
Northern Regional College	No
South West Regional College	No.
Council for Catholic Maintained Schools	No comment on SOP
Council for Curriculum, Examinations and Assessment (CCEA)	These principles are already included in CCEA's handling of complaints however, we would seek to share those outlined in the consultation document with our staff through the delivery of an updated complaints handling training session.
Northern Ireland Council for Integrated Education	The principles are brief, but perhaps too brief in that they do not give a frame of reference for what they relate to. So what is started off in number 1 and what the is the it in number 2. What does matter in number 3? They are not standalone not are they clearly about complaint handling.
Education Authority - Corporate Complaints Service	The EA Corporate Complaints Service have considered the revised Statement of Principles and agree with the six principles to be adopted.
Education Authority - School Development Service	We have fully considered the revised Statement of Principles and agree with the six principles to be adopted.
Northern Ireland National Association for Head Teachers	No comment on SOP
NI Teachers Collaborate	No comment on SOP
South Eastern Regional College	No comment on SOP

## HOUSING SECTOR

Organisation name	Response
Co-Ownership Housing Association	We agree with the statement of principles as set out in the consultation document.
Clanmil Housing Association	No comment on SOP
Choice Housing Association	Be clear - public bodies should be encouraged to avoid jargon/technical terms in complaint responses. Be accessible - public bodies should provide a range of avenues for service users to complain.
Ark Housing Association	Nothing further to add.
Northern Ireland Housing Executive	The Housing Executive currently has a well-developed complaints process and approach which reflects the 6 key principles outlined above. Our complaints procedure is advertised, easily accessible and understood and the Senior Management Team are fully cognisant of the importance of the process as a key element of customer service and business improvement. Our staff will always seek to resolve complaints or issues as early as possible and this is often before they reach the formal complaints stage. Once in the formal process, customers receive a dedicated point of contact and a detailed investigation and response to their complaint. As such, the Housing Executive would welcome the suggested principles as the foundation for any complaints handling standard and approach.
Northern Ireland Federation of Housing Associations	<p>The draft SOP consists of six basic principles that NIPSO believe all public bodies should follow when handling a complaint.</p> <p>The six key principles are:</p> <ol style="list-style-type: none"> <li>1. Start off right</li> <li>2. Fix it early</li> <li>3. Focus on what matters</li> <li>4. Be fair</li> <li>5. Be honest</li> <li>6. Learn and improve.</li> </ol> <p>In addition to the content of the principles, NIFHA would suggest for consideration are,</p> <p>Be clear- public bodies should be encouraged to avoid jargon/technical terms in complaint responses</p> <p>Be accessible- public bodies should provide a range of avenues for service users to complain</p>

## LOCAL GOVERNMENT SECTOR

Organisation name	Response
Ards and North Down Borough Council	<p>We do not feel the principles at present are very customer centric. Please find below suggested alternative principle headings and detail.</p> <p><b>Get it right for the customer First Time</b></p> <ul style="list-style-type: none"> <li>• Act in accordance with the law and relevant guidance, and with regard for the rights of customers concerned.</li> <li>• Ensure that senior leaders support good complaint management and develop an organisational culture that values complaints.</li> <li>• Ensure that the process is simple, personal and fair for customers and colleagues to understand</li> <li>• Have clear governance arrangements, which set out roles and responsibilities, and ensure lessons are learnt from complaints.</li> <li>• Include complaint management as an integral part of service design.</li> <li>• Ensure that staff are equipped and empowered to act decisively to resolve complaints.</li> <li>• Focus on the outcomes for the complainant and the public body.</li> <li>• Signposting throughout to customer and colleague the next stage of the complaint's procedure, in the right way and at the right time. I'm not entirely clear what this one means?</li> <li>• Ensuring the customer is aware of their right to make and escalate their complaint in line with the complaints procedure</li> </ul> <p><b>Be customer focused</b></p> <ul style="list-style-type: none"> <li>• Have clear and simple procedures.</li> <li>• Ensure that customers can easily access the relevant service department who will deal with their complaint at each stage of the process and informing them about advice and advocacy services where appropriate.</li> <li>• Listen to customers to understand the complaint and identify or agree the outcome they are seeking.</li> <li>• Sign Post, customer responses with any other bodies involved in the same complaint, where appropriate.</li> </ul> <p><b>Be open and accountable</b></p> <ul style="list-style-type: none"> <li>• Ensure that information about how to complain is easily available.</li> </ul>

	<ul style="list-style-type: none"> <li>• Provide clear, accurate and complete information to customers about the scope of complaints the organisation can consider; what customers can and cannot expect from the complaint handling arrangements, including timescales and likely remedies; and how, when and where to take things further.</li> <li>• Be open and honest when accounting for decisions and actions, giving clear, evidence-based explanations, and reasons for decisions.</li> <li>• Create and maintain reliable and usable records as evidence of activities to include, the evidence considered and the reasons for decisions..</li> <li>• Handle and process information properly and appropriately, in line with the law and relevant guidance.</li> <li>• Take responsibility for the actions of staff and those acting on behalf of the public body.</li> </ul> <p><b>Treat customers fairly.</b></p> <ul style="list-style-type: none"> <li>• Understand and respect the diversity of customers and ensure fair access to services regardless of background or circumstances.</li> <li>• Investigate complaints thoroughly and fairly, basing decisions on the available facts and evidence, and avoiding undue delay.</li> <li>• Seek to ensure, where a complaint relates to an ongoing relationship between the public body and complainant, that staff do not treat the complainant any differently during or after the complaint.</li> <li>• Avoid the, 'one-size-fits-all' approach to complaint handling and ensure the response to an individual complaint is proportionate to the circumstances.</li> <li>• Any complaint that is personal to a member of staff an impartial approach will be taken by the Public Party so that a fair resolution is sought for all parties in question.</li> </ul> <p><b>Resolution</b></p> <ul style="list-style-type: none"> <li>• Provide fair and proportionate remedies is an integral part of good complaint handling.</li> <li>• Where a public body has failed to get it right and this has led to injustice or hardship, it should take steps to put things right.</li> <li>• That means, if possible, returning complainants and, where appropriate, others who have suffered the same injustice or hardship as a result of the same maladministration or poor service, to the position they were in before this took place.</li> </ul>
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	<ul style="list-style-type: none"> <li>• If that is not possible, it means compensating complainants and such others appropriately. In many cases, a prompt explanation and an apology will be a sufficient and appropriate response and will prevent the complaint escalating</li> <li>• Deal appropriately with a fair response to a complaint that has been upheld.</li> <li>• These include: <ul style="list-style-type: none"> <li>• an apology, explanation and acknowledgement of responsibility</li> <li>• remedial action, which may include reviewing or changing a decision on the service given to an individual complainant; revising published material; revising procedures, policies or guidance to prevent the same thing happening again; training or supervising staff; or any combination of these</li> <li>• financial compensation for direct or indirect financial loss, loss of opportunity, inconvenience, distress, or any combination of these. When deciding the level of financial compensation, public bodies should consider: <ul style="list-style-type: none"> <li>• the nature of the complaint</li> <li>• the impact on the complainant</li> <li>• how long it took to resolve the complaint</li> <li>• the trouble the complainant was put to in pursuing it.</li> </ul> </li> </ul> </li> </ul> <p>Remedies may also need to take account of any injustice or hardship that has resulted from pursuing the complaint as well as from the original dispute.</p> <p><b>Seek continual improvement:</b></p> <ul style="list-style-type: none"> <li>• Regularly review complaints handling procedures.</li> <li>• Provide complaints handling training for relevant staff.</li> <li>• Regularly publish complaint outcomes and use feedback to help improve service delivery.</li> <li>• Record, analyse and learn from complaints. Review the complainant's journey and satisfaction.</li> <li>• Promote complaints handling networking opportunities with stakeholders.</li> </ul>
Causeway Coast & Glens Borough Council	Agree with the content of the principles which form a sound basis for the approach to complaints handling.
Lisburn & Castlereagh City Council	Agree that these six key principles are appropriate.
Newry, Mourne & Down District Council	Council values complaints as important feedback from the people it serves on how it is performing. The principles as outlined underpin an effective complaint handling system.
Fermanagh & Omagh District Council	Fermanagh and Omagh District Council would be supportive of the Principles as identified within the Consultation document, as they provide a succinct description against which the actions of Public Bodies can be measured.
Mid & East Antrim Borough Council	The NIPSO principles are broadly in line with how Council handles complaints. Additional guidance and training from NIPSO would allow these principles to be imbedded further into all public sector organisations. In large organisations

	there will be numerous members of staff involved in responding to complaints, and turning worthy aspirations into a practical corporate mentality is going to require an investment of resources, time and effort.
Belfast City Council	The principles as stated are sufficiently comprehensive, easily understood and will, in the council's opinion, meet the needs of both the council and its customers.
Antrim & Newtownabbey Borough Council	No - we feel that the six key principles proposed capture the process of complaint handling well.
Mid Ulster Council	No comment on SOP
Northern Ireland Local Government Officer's Superannuation Committee	No - the principles are comprehensive and cover what NILGOSC already does. It should be noted that NILGOSC has statutory timescales and a formal two stage process that applies to its internal dispute resolution procedure ("IDRP"), in respect of decisions made by NILGOSC, in respect of pension benefits. Regulations 84(9), 85(1) and 87(1) of the Local Government Pension Scheme Regulations (Northern Ireland) 2014 (SRNI 2014/188) (the "2014 Regulations") set out the timescales for raising a dispute. NILGOSC currently follows this process for all formal complaints that it receives. Certain decisions rest with the participating employer and where a member has a complaint about such a decision, the regulations provide that it shall be dealt with in the first instance by the employer and if the member is unhappy with the decision or if the employer fails to make a decision, the member may refer the matter to the county court for a determination (see reg. 80 and reg. 89). Almost all participating employers are public authorities.

## CENTRAL GOVERNMENT SECTOR

Organisation name	Response
Department of Education	I am supportive of the establishment of a set of guiding principles within which we, and the wider public sector, will operate.
Department for Communities	The Statement of Principles outlined in the draft consultation paper is aligned to DfC's policy and therefore we support the introduction of these principles. An element for consideration may be to incorporate the Complainant's responsibilities within The Statement of Principles.
Department for Justice	The Department of Justice currently has a robust Complaints Policy in place which follows the principles in line with NIPSO guidance. The Department welcomes the benefits of having an agreed set of principles, set by NIPSO, which can form the basis to provide for a level of consistency in approach across all public bodies in Northern Ireland.
Department for Health	<p>I agree with the six key principle proposed in your document and believe they provide a strong foundation to support change and deliver a much needed simplified and consistent approach to the systems for complaints management for members of the public.</p> <p>'Focus on what matters' outlines the steps to be taken to ensure that the complainant is fully involved and 'at the heart' of the complaints process. Under this principle I would also like to see clarity around family/carer engagement and the opportunity, where appropriate, for them to be involved in the process and for their positions to be understood and addressed. Making a complaint can be a difficult experience for service users and their families/carers. Therefore, it is imperative that all those involved in a complaint feel supported, included and more importantly it is essential we deliver a culture of open dialogue and conversation to achieve early resolution thereby reducing the potential for any additional distress.</p> <p>As you may be aware, a consultation on options for proposed Duty of Candour legislation and Being Open Framework closed on 31 August and responses are being analysed at present. The proposed Being Open Framework, as outlined in the Duty of Candour consultation document, sets out potential mechanisms which would assist such cultural change, including supporting service users and their families/carers to navigate the system and ensuring that they experience openness and candour in all of their dealings with the health system.</p> <p>Similarly, I would suggest the inclusion of an objective within the 'Be Fair' principle that reflects a commitment to act fairly and provide appropriate support to staff involved in a complaint. It is essential that staff are also treated with</p>

	dignity and respect throughout the complaints process and informed when they have been complained about and, where appropriate, be given the opportunity to respond to the complaint.
Department for Economy	We suggest that the name of the 2nd principle - 'Fix it early' may create an unrealistic expectation amongst those who submit complaints and should be changed to 'Address it early'. In our experience, particularly in relation to the recent payment of Covid-19 business grants, it is often the case that the Department is unable to offer the redress sought.
Labour Relations Agency	The principles and procedures are comprehensive and clear.
Land & Property Services	LPS is content with the principles. The six principles listed are effectively covered throughout the existing LPS Guide to effective handling of Complaints, AQs, Private Office & MP / MLA Correspondence policy document.
Northern Ireland Audit Office	NIAO supports the six key principles as set out in the document. The details underpinning the principles are concise and clear. However, to add further clarity of purpose, under Principle 1, 'Start Off Right', we would propose that you add: 1. Talk to the complainant as soon as possible (this is often the most effective way of addressing the issue, rather than creating an email trail); 2. Gain a clear understanding of the complaint from the outset; 3. Be courteous and respectful in all communications; 4. Ensure an appropriately skilled and knowledgeable member of staff is dealing with the complaint.
Libraries Northern Ireland	Libraries NI welcomes and agrees with the proposed Statement of Principles and believes that they would provide a framework within which public bodies can reflect and affirm their commitment to a complaints process that is straightforward, fair, and time bound.
Probation Board Northern Ireland	PBNI fully supports the six basic principles that NIPSO believe all public bodies should follow when handling a complaint. PBNI focus on all six elements within its complaints procedures and believes that we should treat complaints as a learning opportunity for staff and the wider organisation. We report on the trends in relation to complaints and they are recorded annually in the PBNI Annual Report. We regularly provide training to staff and seek to use complaints as a means of improving our practice. We seek always to treat people honestly, fairly and in line with our organisational values. We also focus on trying to start off the complaints process correctly for all complainants and fix issues early at local resolution stage if possible.
Consumer Council NI	No, in our opinion the principles cover all of the important factors that should go into investigating and responding to a complaint. The only point that should be stressed in the first principle 'Start off right' is that the complaints process/procedure is accessible to consumers. We deal with many service providers who hide their complaints process and make it difficult to complain. A complaints process should be pro-actively provided to consumers and should be available in a range of formats, including a hard copy publication (one that can be posted to consumers as part of an acknowledgement letter or any written correspondence sent to the consumer), links to the process that can be sent via email and also available on the website. We also suggest that 'putting the complainant at the heart of the process' and

	<p>'accommodating different consumers' needs' should be in Principle 1 as these form the basis of getting it right from the outset and making sure that the consumer's needs are met. This is particularly important when dealing with vulnerable consumers - it is important that complaints can be made in a variety of ways and if they can't be put in writing that there is an alternative method available so as to not create barriers to complaining.</p>	
National Museums NI	Of the six key principles identified, NMNI feels that it addresses these in the following manner;	
	<b>Principle</b>	<b>NMNI Course of Action</b>
	1) <b>Start off Right</b>	NMNI are keen to welcome feedback and complaints and our policy clearly states this as we use this feedback to improve our services
	2) <b>Fix it Early</b>	In our complaints policy we encourage our customers to contact us early so that we can find a quick and adequate solution. We have a dedicated contact for complaints which is regularly monitored. We also have a complaints database where we scribe all complaints. These are then analysed and a report is provided on a quarterly basis to determine if there are any trends or any areas for concern.
	3) <b>Focus on what matters</b>	NMNI have a two stage process which is clearly outlined with SLA's included in our Complaints policy.
	4) <b>Be fair</b>	NMNI treats all complaints, comments and feedback with objectivity, fairness and openness in the decision making process.
	5) <b>Be Honest</b>	As an arm's length body of NICS, NMNI are committed to being transparent and fair in all actions they undertake. We continually strive to raise our standards.
	6) <b>Learn &amp; Improve</b>	National Museum NI are committed to improving services across our organisation therefore we use all of the feedback we receive to continually update how we communicate and interact with our various visitors across the breadth of our Visitor Journey whichever that may

		be. As I mentioned NMNI have recently updated their complaint handling procedures and this was approved by our board of Trustees in March 2021. We will review and amend our complaints policy on a cyclical 2 year basis using the information from any complaints and/or feedback during that period to ensure that we are embedding the principles of equality and inclusivity into all we do.
Charity Commission for Northern Ireland	The principles outlined are considered to be sensible and deliverable.	

## OTHER

Organisation name	Response
Scottish Public Services Ombudsman	<p>The Scottish Public Services Ombudsman has been responsible for developing monitoring and supporting Model Complaints Handling Procedures for over 10 years. The principles proposed are clear and straightforward and cover all the areas that in our experience make a difference to both users of services and organisations handling complaints. Not only has the introduction of the model in Scotland led to a much more focused and professional culture of complaint-handling in public bodies, but improvements in local handling have also enabled the SPSO to develop more streamlined processes when we receive complaints at the final stage. We are delighted that NIPSO has been given the statutory powers to also take this approach. We look forward to supporting and sharing learning from both ours and NIPSO's experience in the years to come. In responding to the detailed questions below, the statistical evidence we provide is current to 2019/20. The last year and a half has been very unusual because of the pandemic and, while our 2020/21 statistics are publicly available, they are not directly comparable to previous years.</p>
Information Commissioner's Office	<p>As you will be aware, the Information Commissioner's role includes the regulation of the Data Protection Act 2018 (DPA18), the UK General Data Protection Regulation (UK GDPR) and the Freedom of Information Act 2000 (FOIA). As such, our response focuses upon the Statement of Principles rather than the model procedure. Nevertheless, we acknowledge the importance of a robust complaints procedure in the public sector and its subsequent impact on public trust and confidence.</p> <p>Whilst derived to assist public bodies in Northern Ireland in managing complaints received by them, the six principles complement the principles of data protection contained in Art. 5 of the UK GDPR and the information access rights legislated within FOIA. Conforming to the Statement of Principles will not only enhance the practices of these bodies whilst handling complaints, but will also assist their compliance with data protection and other information rights legislation. As such, they are welcomed by us.</p> <p>The ICO promotes openness and transparency by public bodies, a theme that is reflected in the Statement of Principles. The importance of communication during the complaints process – whether relating to procedure, the investigation itself and the outcomes – is stressed throughout. Such candour should engender confidence in the system for the complainant, even where complaints are not upheld.</p>

	<p>Further transparency will be seen through the publication of registers of complaints received and the associated outcomes. This should be encouraged but care should be given to ensure that complaints are anonymised appropriately, something of special importance where the subject is particularly sensitive. For information, please note that the ICO is currently preparing new guidance covering anonymisation and pseudonymisation as well as other privacy enhancing techniques which we hope to publish towards the end of this calendar year. All systems and procedures should, of course, be developed to ensure compliance with the DPA18, UK GDPR and FOIA.</p> <p>As indicated, we are supportive of the Statement of Principals contained within the consultation document and see many complementarities with our work. We would welcome the opportunity to discuss this further with you.</p>
Alliance Party	<p>Start off right. Ensure effective and timely communication with both parties (complainant and person/body that is at centre of the claim) to ensure timely responses. Ensure that complainant understands process of complaints procedure. Ensure that, where foreseeable, the point of contact who is provided will be available within timescales given to the complainant. Learn and improve. Ensure that best practise is shared with other staff and lessons learned are easily accessible to all. Introduce the use of a survey to gain feedback from those who use the service, especially in early days.</p>