

Q2g: Please consider each element of the draft MCHP outlined below and comment on any changes or additions.

In more complex cases, if it is not possible to meet the 20-day timeframe, a revised timescale should be provided, and an update at least once every 20 working days on the progress of the investigation.

HEALTH SECTOR

Organisation name	Response
Northern Ireland Ambulance Service	NIAS agree that more complex cases will require longer than 20 working days to be completed. As previously commented, NIAS suggests that timescales should be based on the level of seriousness of the complaint by grading them against a risk matrix, which factors in the consequences of the incident against the likelihood of it reoccurring. A complaints handling model with its response timeframes based on a risk matrix, rather than a one-size fits all approach, will provide clearer more manageable expectations for the complainant, provide timescales for more complex investigations and provide a fairer model for organisations to deliver against.
Southern Health & Social Care Trust – email submission	No response to question.
Southern Health & Social Care Trust – online submission	No response to question.
Health & Social Care Board	The maximum extension to a frontline response (stage 1) is 5 working days from date of receipt meaning that if a complaint has not been closed within ten working days, it should be escalated to stage 2 for final response, the only exception being the absence of a key staff member. As previously stated the HSCB believes that the formalisation of this stage in terms of timescales, responding, identification of complaints that require to immediately be handled at the second stage, etc places increased pressure on already busy frontline staff.

	<p>It would be the HSCB's opinion that the current 'on the spot' resolution of complaints has been simple and effective, with clear information available in all public facing areas (posters, leaflets) on how to raise a complaint with front-line staff or via the Complaints Department.</p> <p>Staff have received training on complaints handling both on the importance of seeking to resolve the complaint 'on the spot' and referral to their line manager if this is not possible, and also on the HSC Complaints Procedure in general.</p>
NHS	No
Woodbrooke Medical Practice	No response to question.
HSC Trust Complaints Forum	<p>Please see response provided to question above re the contradiction between paragraph 57 and 58. Yes agree that in more complex cases, it will take longer to ensure a full and quality response. In reality, it can be difficult to provide an actual date for such cases but it is the keeping in contact with the complainant re progress that is important. Currently within the HSC Complaints Procedure, we already update our complainants every 20 working days on progress. In reality in very busy HSC services, investigating complaints is only one part of a job of those managers/professionals in the front line services investigating complaints. Unforeseen circumstances do arise to and these staff often have to reprioritise their duties to focus on patient care and safety, thus causing delays in investigating complaints. If a further date is given and then it is not met, this can be very frustrating for complainants.</p>
Patient Client Council	PCC welcome this approach.
General Medical Council	No response to question.
Medical Protection Society	<p>MPS agrees with the principle that, where timeframes are imposed by a complaints handling procedure, there needs to be flexibility in order to recognise extenuating circumstances (including particularly complex clinical complaints). We agree that the complainant should be kept updated on progress, where there is a delay. We suggest, in passing, that the NIPSO should consider adopting a similar approach in cases accepted for investigation by the Office.</p>
CHASNI	<p>Not acceptable, once every 20 days for an update is too long, weekly email or call even if nothing has changed. Keeping people updated every step even if there is nothing new to add, people need to feel like you are taking their situation seriously, a courtesy call weekly is what I would like to see</p>
Northern Health & Social Care Trust	No response to question.

EDUCATION SECTOR

Organisation name	Response
Council for Curriculum, Examinations and Assessment (CCEA)	No response to question.
Spires Integrated Primary School	No response to question.
Belfast Metropolitan College	Yes. provision for revised timescale should be in place. however, organisations should have the ability to highlight additional exceptions to timescales e.g. College closure weeks, academic staff leave, etc. Our joint sector policy currently has such exceptions to timescales in place and is widely publicised.
South West Regional College	WC agrees. Provision for revised timescale should be in place however the organisation should have the ability to highlight additional exceptions to timescales e.g. College closure weeks, academic staff leave, etc. Our joint sector policy currently has such exceptions to timescales in place and is widely publicised.
Northern Regional College	Yes, provision for revised timescale should be in place however organisation should have the ability to highlight additional exceptions to timescales e.g. College closure weeks, academic staff leave, etc. Our joint sector policy currently has such exceptions to timescales in place and is widely publicised.
Education Authority - School Development Service	This is already in place and is clearly stated in the EA model schools' procedure.
Education Authority - Corporate Complaints Service	It is suggested that 25 workdays is a more appropriate time period for Stage 2 responses. It is acknowledged that not all investigations will be able to meet the response deadline, whether it be 20 or 25 working days. It is agreed that the customer should be provided with a revised timescale and updated at least once every 20 working days on the progress of the investigation.
Council for Catholic Maintained Schools	In exceptional what constitutes exceptional? Quite often you may have to wait to speak with a key witness.
Northern Ireland National Association for Head Teachers	No response to question.
Northern Ireland Council for Integrated Education	Agree
NI Teachers Collaborate	Yes, provision for revised timescale should be in place however organisation should have the ability to highlight additional exceptions to timescales e.g. College closure weeks, academic staff leave, etc.

	Our joint sector policy currently has such exceptions to timescales in place and is widely publicised.
South Eastern Regional College	Yes, provision for revised timescale should be in place however organisation should have the ability to highlight additional exceptions to timescales e.g. College closure weeks, academic staff leave, etc. The FE sector policy currently has such exceptions to timescales in place and is widely publicised.

HOUSING SECTOR

Organisation name	Response
Co-Ownership Housing Association	We agree that the timeframes themselves would appear to be appropriate in the circumstances, subject to our comments
Clanmil Housing Association	No response to question.
Choice Housing Association	It is widely recognised that complaints received are increasingly complex and challenging, requiring careful assessment to determine key issues. We welcome the proposal that an extension beyond the 20 day time frame is possible and feel an update every 20 days ensures that the complainant is kept abreast of progress.
Ark Housing Association	Agree
Northern Ireland Housing Executive	The Housing Executive is pleased to note the inclusion of this important caveat as part of the consultation, as it was not clear from the initial draft complaints handling model published that any such recognition for complex cases was in place. Given the level of investigation required it is likely that a significant number, and in all probability a significant majority, of Housing Executive complaints at investigation stage will fall into this category. We would estimate that currently at least 70% of Housing Executive cases would fall into this category. The Housing Executive agrees that in any cases where it is not possible to meet the initial timescale, customers should be kept informed of progress on their case on a regular basis. In line with the principle of starting off Right and managing the customer expectations some flexibility should be given to organisations to inform the customer at the start of the process that their case is a complex one and as such is likely to exceed the 20 day timescale for investigation. Where available, this may include a typical timescale for response and an agreed timeframe in which to update the customer, which may not coincide with the initial 20 day period.
Northern Ireland Federation of Housing Associations	Agreed. It is widely recognised that complaints received are increasingly complex and challenging, requiring careful assessment to determine key issues. We welcome the proposal that an extension beyond the 20-day time frame is possible and feel an update every 20 days ensures that the complainant is kept abreast of progress.

LOCAL GOVERNMENT

Organisation name	Response
Ards and North Down Borough Council	No response to question.
Causeway Coast & Glens Borough Council	Agree
Lisburn & Castlereagh City Council	Agree with this point.
Newry, Mourne & Down District Council	The clarification regarding the extension provisions in complex or sensitive cases is welcomed. The use of a revised timescale is likely to be helpful in Planning related cases which often require considerable investigation before a response is issued.
Fermanagh & Omagh District Council	Agreed.
Mid & East Antrim Borough Council	Council supports this approach. Such mechanisms may be required when dealing with particularly complex complaints.
Belfast City Council	This is a very practical and efficient approach which will allow more time when needed for complex complaints, such as those involving planning service, to be addressed within an extended time frame. And will also keep the complainant aware of progress at pre-agreed milestones in the investigation process.
Antrim & Newtownabbey Borough Council	As previously stated, our approach is up to 10 working days to resolve complaints at both stages. If it is not possible to resolve the complaint within the set timescales then a revised timescale should be provided, but we would recommend an update every 10 working days during the investigation, 20 working days is too long to keep a customer waiting.
Mid Ulster Council	No response to question.
Northern Ireland Local Government Officer's Superannuation Committee	As set out in the response to the previous question a revised timescale and update is provided if the two month deadline will not be met.

CENTRAL GOVERNMENT

Organisation name	Response
Department of Education	No response to question.
Department for Communities	No response to question.
Department for Justice	No response to question.
Department for Health	No response to question.
Department for Economy	Agreed.
National Museums NI	NMNI's CHP is in parallel to that which is proposed in your MCHP
Land & Property Services	When appropriate, LPS issues "interim letters" advising the customer that our ten day deadline for response will not be met, but we will provide one as soon as we possibly can. However, we would be open to an update every twenty days.
Northern Ireland Audit Office	Where such deadlines cannot be met, it is important to keep the complainant informed and provide her/him with a likely timetable for response. NIAO considers the proposal to update the client at least once every 20 working days on the progress of the investigation is reasonable.
Probation Board for Northern Ireland	PBNI make provision for an extension of time frame for more complex cases. It is however rarely used or needed. We would however agree that this should be included in complaints handling mechanisms.
The Consumer Council Northern Ireland	This again will vary by organisation and is very much dependent on the complexity of each case, but 20 working days is a long time and could serve to further frustrate a consumer. When we are unable to provide a response within our 10 day time frame, we update the consumer every 5 working days. Keeping the consumer at the heart of the complaint is paramount and therefore regular updates ensure that the consumer does not feel 'forgotten' and gives them assurances that their complaint is important to the organisation and is being given the time that it deserves.
Charity Commission for Northern Ireland	The Charity Commission for Northern Ireland has used this timescale approach and has found that it is practical.

OTHER

Organisation name	Response
Information Commissioner's Office	No response to question.
Scottish Public Services Ombudsman	Some complaints will take longer than 20 working days and, in those cases, keeping the complainant informed is essential and good customer service.
Alliance Party	Supportive of 20 day time frame.