

Q2h: Please consider each element of the draft MCHP outlined below and comment on any changes or additions.

Information about complaints received should be reported and publicised.

HEALTH SECTOR

Organisation name	Response
Northern Ireland Ambulance Service	Agree. All Trust's already publish an annual complaints report.
Southern Health & Social Care Trust – email submission	SHSCT notes the requirement to regularly publish complaint outcomes and user feedback. In SHSCT, a sample of these is included in the quarterly reports to the Patient and Client Experience Committee and in the Annual Service User Feedback report. We should be grateful if NIPSO would indicate if there is an expectation of wider reporting in this regard.
Southern Health & Social Care Trust – online submission	Learning and Improvement SHSCT notes the requirement to regularly publish complaint outcomes and user feedback. In SHSCT, a sample of these is included in the quarterly reports to the Patient & Client Experience Committee and in the Annual Service User Feedback Report. We should be grateful if NIPSO would indicate if there is an expectation of wider reporting in this regard.
Health & Social Care Board	No response to question.
NHS	No
Woodbrooke Medical Practice	I note the requirement to 'regularly publish complaint outcomes'; clarification is required on how frequently this will be and in what format. 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.
HSC Trust Complaints Forum	Yes and HSC Trusts currently do publish information about complaints.

Patient Client Council	PCC welcome this suggestion. The publication of anonymised information about complaints received would provide greater transparency across systems. Furthermore, it would permit analysis of complaints which can further drive learning and improvement.
General Medical Council	No response to question.
Medical Protection Society	MPS disagrees with this proposal as a general principle because it fails to recognise the different nature of the organisations providing public health care in Northern Ireland and in particular, the limited resources of small general medical and general dental practices -which invariably lack a dedicated complaints handling department-. We consider that the current arrangements, whereby family practitioner services are required to share information with the Health & Social Care Board and where HSC Trusts are required to produce an annual complaints report, are sufficient.
CHASNI	Agree
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	More information is required as there is a sector concern about published complaints that are not upheld as well as how much detail is proposed to be included. In reference to regular publishing of outcomes and how this would look in practice; publishing information about complaints could contravene data protection legislation.
South West Regional College	SWC considers that more information is required as there is a sector concern about published complaints that are not upheld as well as how much detail is proposed to be included. In reference to regular publishing of outcomes and how this would look in practice; publishing information about complaints could contravene data protection legislation.
Northern Regional College	More information is required as there is a sector concern about published complaints that are not upheld as well as how much detail is proposed to be included. In reference to regular publishing of outcomes and how this would look in practice; publishing information about complaints could contravene data protection legislation.
Education Authority - School Development Service	EA would be content to add this to the model schools' procedure with a suggestion that information about complaints handling statistics might be published in the BoG annual report or on the school website.
Education Authority - Corporate Complaints Service	<p>The EA Corporate Complaints Service is currently undergoing significant change and have recently implemented a new Complaints Management System which will now allow us to start to report quarterly to senior management on performance statistics and provide analysis of trends and outcomes of complaints. We want to continue to develop our service and improve communications with our customers on the value of complaining. It is believed that the publication of complaints performance data and trend analysis would demonstrate how complaints improve our services, ensure transparency in our complaints handling service and help to show our customers that we value their complaints. The EA are keen to build on our reporting function and would welcome discussions with the NIPSO on recommendations regarding the publication of complaints data and guidance on:</p> <ul style="list-style-type: none"> a) How often should complaint data be published? b) In what format should the information be provided i.e. Annual Performance Reports/ newsletters/publications on websites? c) What performance statistics should be published?

Council for Catholic Maintained Schools	No response to question.
Northern Ireland National Association for Head Teachers	No response to question.
Northern Ireland Council for Integrated Education	We would be concerned that there will many complaints which will have GDPR and other privacy implications. Whose responsibility will that element of the complaints be? NIPSO or the originating organisation? Who is responsible for the redacting of the personal information?
NI Teachers Collaborate	More information is required as there is a sector concern about published complaints that are not upheld as well as how much detail is proposed to be included. In reference to regular publishing of outcomes and how this would look in practice; publishing information about complaints could contravene data protection legislation.
South Eastern Regional College	More information is required SERC is concerned about published complaints that are not upheld as well as how much detail is proposed to be included. In reference to regular publishing of outcomes and how this would look in practice; publishing information about complaints could contravene data protection legislation.

HOUSING SECTOR

Organisation name	Response
Co-Ownership Housing Association	We agree that information about complaints should be reported and publicised generally. There may be a need to give sufficient detail about the nature of the complaint, the outcome and learnings from it. However, this should be done in a way that protects the personal data of the complainant. It may be appropriate that complaints are aggregated up to various sectors so that they are reported in this way rather than at an organisational level.
Clanmil Housing Association	The reporting on data by HAs would also have to be consistent and published periodically by NIPSO or DfC. This would create more transparency of housing associations' management of complaints.
Choice Housing Association	Choice would welcome further clarity as to what type of information NIPSO feels should be reported and published. Housing Associations have mechanisms for reporting and monitoring complaints within their organisations including Committee / Board level. In addition, Associations report complaint information to their regulator i.e. Department for Communities within the Annual Regulatory Reporting process. Choice also reports complaint data in annual reports and on our website which is widely available to all.
Ark Housing Association	Agree. Housing Associations already publish complaints statistics within annual reports and report to DfC. Standard reporting on complaints would be beneficial.
Northern Ireland Housing Executive	The Housing Executive currently publishes information about its complaints through its website and in several publications. The Housing Executive would be of the view that consideration should be given to the ability to report on performance against the complexity of the case. As such the 20 day target will not apply to cases which are complex and any performance reporting should allow for adjustments to be made to reflect this.
Northern Ireland Federation of Housing Associations	Agreed, Housing associations already publish complaints statistics within Annual reports and reports to Department for Communities. Standard reporting on complaints would be beneficial. Housing Associations have mechanisms for reporting and monitoring complaints within their organisations including Committee / Board level. In addition, Association's report complaint information to their regulator i.e., Department for Communities within the Annual Regulatory Reporting process.

LOCAL GOVERNMENT SECTOR

Organisation name	Response
Ards and North Down Borough Council	<p>We agree although I do feel that it would need to be managed by the public body in question so that it can be used as a positive not a negative and that we can publicise positive outcomes and learning embedded.</p> <p>If reporting is being done by the Ombudsman on a sectoral basis consistency is critical.</p> <p>We feel that we should have a category for each complaint for e.g. each department within the Council? Or consistent across all public bodies?</p> <p>Nature of common complaints and resolution that has taken place and what learning that we have embedded from the feedback that has given and investigations that has taken place.</p> <p>This needs to be as concise as possible to ensure consistency and not creating additional workload. If there were set criteria (a dropdown list) for example it would also help with benchmarking statistics and consistency of approach.</p>
Causeway Coast & Glens Borough Council	<p>Agree. Consistency required on what statistics are to be reported on and to who e.g. NIPSO, Council. CC&GBC currently reports complaints statistics to APSE as part of Performance Improvement e.g. number of complaints received per 1000, time taken to resolve complaints, % of complaints resolved.</p>
Lisburn & Castlereagh City Council	<p>Agree with this point. Learning from complaints should be recorded and reported. As a council we already do this on a quarterly basis to our committees.</p>
Newry, Mourne & Down District Council	<p>Agreed. Were this done any such information should be anonymized and be compliant with organisations GDPR requirements.</p>
Fermanagh & Omagh District Council	<p>Agreed in principle but await more detail on the actual requirements, taking into account GDPR requirements where it may be possible to identify a complainant due to the subject nature, even though personal information had been redacted.</p>
Mid & East Antrim Borough Council	<p>In terms of accountability and transparency, Council supports this approach. Council would welcome an agreed standardised reporting model for the public sector. This would allow for public sector organisations to report in a</p>

	uniform manner. A difference in organisational complaint recording and handling may result in unfair public perception if a uniform reporting model is not adopted.
Belfast City Council	Agree. Council already reports on all aspects of complaints management. And equally an easily understood quarterly and annual report, posted on the councils website, would meet this requirement.
Antrim & Newtownabbey Borough Council	Yes, we completely agree. This is important for monitoring purposes, openness and transparency.
Mid Ulster Council	No response to question.
Northern Ireland Local Government Officer's Superannuation Committee	NILGOSC includes summary figures and types of complaints in its Annual Report.

CENTRAL GOVERNMENT

Organisation name	Response
Department of Education	No response to question.
Department for Communities	No response to question.
Department for Justice	The Department currently compiles an annual report in relation to complaints received by the Department (and Agencies). It provides information relating to: number of complaints; category of complaints; number responded to within/outside deadlines; number upheld/not upheld, and; lessons learned. While we welcome openness and transparency, we would have reservations publishing full details of all complaints received due to the nature of some received, and also possible security issues. However, we would be amenable to publishing a diluted version of our annual report which would focus on the statistical information contained therein.
Department for Health	No response to question.
Department for Economy	This would depend on what information is proposed to be reported and published, for example, all public authorities must comply with data protection legislation.
National Museums NI	No response to question
Land & Property Services	LPS Complaints Statistics are published on the Open Data platform. The number of complaints received are reported to DoF Corporate Governance colleagues on a quarterly basis, whilst our Management Board are regularly updated with information also on a quarterly basis. LPS Complaints are also published in the Departments Annual Report and Accounts.
Northern Ireland Audit Office	NIAO agrees with this proposal as we understand, NIPSO reports publicly on all matters investigated. NIAO also records a summary of complaints in the Corporate Governance section of the Annual Report and Accounts.
Probation Board for Northern Ireland	PBNI agree with this. Each year within the PBNI Annual Report and Accounts a section is included on complaints received during the year. We include details on the numbers of complaints, the outcome of complaints, and the kind of matters being complained about. We also note any trends in numbers or subject matter. PBNI discuss complaints on a quarterly basis at Senior Leadership Team and Board. We also have a section of the PBNI website and staff intranet dedicated to complaints handling.
The Consumer Council Northern Ireland	We publish our Service Standard results quarterly on our website and this includes our performance against meeting our 3 day and 10 day time frames in relation to complaints made about us. We also are transparent about how many

	<p>complaints we receive every quarter. We do not publish specific details about the cases but we have a section on our website called 'Noted/Sorted' - this showcases how we use negative consumer feedback to improve our services and how we adapt our services to meet the needs and suggestions put forward by consumers.</p> <p>https://www.consumercouncil.org.uk/noted-sorted</p>
Charity Commission for Northern Ireland	<p>While respecting the confidentiality of complainants and the issues raised, as well as consideration of where public reporting may impact on sensitive work processes, the reporting of complaints would support an organisations commitment to openness and transparency. Obviously consideration will be needed regarding obligations under the Data Protection Act 2018 and NIPSO's statutory bar on disclosure.</p>

OTHER

Organisation name	Response
Information Commissioner's Office	<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.</p>
Scottish Public Services Ombudsman	We are strongly supportive of this. As well as supporting benchmarking and learning across organisations, this builds public confidence that complaints are taken seriously and responded to appropriately. It also shows people what types of complaints they can make and what types of outcomes can be achieved.
Alliance Party	Reporting and publicising complaints should be done in a way that conceals the identity of all persons involved. Consideration should be taken over specific, sensitive cases and when it is not in the best interest of the complainant to report and publish the complaint. It should be considered if the reporting and publicising of complaints would deter people from coming forward with issues. Unless the complainant explicitly agrees to go public on their complaint any publicity should not in any way reveal or imply identity of the complainant.