

Question 4:

NIPSO has yet to decide the first sector(s) it will work with to introduce the MCHPs. Some of the factors being considered in this decision are: the number of complaints received by the sector, size/complexity of the sector, risk attached to public service provision. Do you have any views on this issue?

HEALTH SECTOR

Organisation name	Response
Northern Ireland Ambulance Service Trust (NIASST)	With health and social care already having a robust complaints procedure in place, it is understandable that NIPSO may wish to introduce the MCHPs with a sector whose complaints handling procedures are not as well defined.
Southern Health & Social Care Trust (SHSCT)	Questionnaire submission – No response to question Email submission - No response to question
Northern Health & Social Care Trust (NHSCT)	Have we considered policing as a sector as there is significant collaboration across the sectors in relation to safeguarding?
Health & Social Care Board (HSCB)	No response to question
NHS	No
Woodbrooke Medical Practice	No response to question
HSC Trust Complaints Forum	No particular preference as we feel we have a fairly similar model already currently in place in the HSC Complaints Procedure.

Patient Client Council (PCC)	No response to question
General Medical Council (GMC)	No response to question
Medical Protection Society (MPS)	MPS disagrees with this requirement as we believe it is unnecessary given the existence of the HSC Complaints Procedure, which is adequate. However, if NIPSO is minded to proceed on these grounds we request that the health and social care sector should be the last sector to undergo intervention because: (i) there is an existing HSC Complaints Procedure that is robust and closely aligned with the draft MCHP; (ii) the impact of the COVID-19 pandemic must be recognised and the services given time to recover without additional administrative burdens.
Care Home Advice and Support NI (CHASNI)	Each sector is as important as the next. If you're not getting many complaints from one sector you need to look into it and understand why? Maybe that's the sector you need to work hardest on firstly.

EDUCATION SECTOR

Organisation name	Response
Spires Integrated Primary School	No response to question
Belfast Metropolitan College	There are a number of more pressing concerns to be addressed in the proposed model before this can be considered.
Northern Regional College	There are a number of more pressing concerns to be addressed with the proposed model before this can be considered.
South West College	There are a number of more pressing concerns to be addressed in the proposed model before this can be considered.
Council for Catholic Maintained Schools (CCMS)	No response to question
Council for Curriculum, Examinations and Assessment (CCEA)	No response to question
Northern Ireland Council for Integrated Education (NICIE)	Pareto 80/20 rule may be useful, biggest impact for public and public purse may be important criteria.
Education Authority (EA) - Corporate Complaints Service	<p>As you are aware, EA will make two responses to this questionnaire. The EA Corporate Complaints Service and the School Development Service. The Corporate Complaints Service would welcome an early engagement however the School Development Service would prefer to engage later in the process. The EA's Corporate Complaints Service have been implementing significant changes within this last year regarding complaints management within the organisation.</p> <p>These changes include:</p> <ul style="list-style-type: none"> a) The move from a three stage complaints process to a two stage process;

	<ul style="list-style-type: none"> b) The introduction of a new Complaints Management system which enables the capturing of complaints, allows for recording of follow up actions and lessons learned and enables effective reporting of complaints information; c) Introduction of an online form for frontline staff which automatically uploads important complaints information; d) Preparation of new policy and procedural documentation, various resource documentation for EA staff, new customer information and an easy read document for customers; and e) Mandatory complaints handling and awareness training has been rolled out across the Authority. <p>The above has led to the Complaints Service having significant communications with various levels of EA staff from frontline staff to management staff who are engaging in adopting new processes and procedures and who now have an increased awareness regarding complaints handling (as a result of mandatory training). Accordingly, the EA want to continue to advise and support staff as best possible regarding effective and efficient complaints management. We appreciate that there are other public bodies who likely report significantly higher rates of complaints e.g. HSC however we eager and ready to engage with the NIPSO as soon as possible to continue to improve and further develop complaints handling in the EA in line with NIPSO recommendations and best practice.</p>
Education Authority (EA) - School Development Service	<p>As you are aware, EA will make two responses to this questionnaire. The EA Corporate Complaints Service and the School Development Service. The corporate service would welcome an early engagement however the school development service would prefer to engage later in the process.</p> <p>The latter service has collaborated with other education partners and already worked with NIPSO to implement a two-stage model complaints procedure in 2016, replacing the original five-stage procedure. This incorporates the spirit of the NISPO principles and has incorporated most of the procedural elements in the MCHP. As a result of this, we consider that schools present low risk and could be left to the later part of engagement process.</p> <p>At the present time, schools are under tremendous stress. They are dealing with the out-working of the covid19 pandemic. Strategies to manage the situation change regularly and this is adding to the</p>

	stress levels. Our view is that schools would appreciate any engagement being planned for the future as opposed to being undertaken during this year. This would enable them to have the time and energy to fully engage with the work. EA does, however, propose to facilitate a brief post implementation review of the current model schools' procedure to introduce a small number of amendments. This work was planned before the launch of the NIPSO consultation. EA will work with sectoral partners as before, though we will now also take account of relevant aspects of the MCHP.
National Association for Head Teachers Northern Ireland (NAHTNI)	No response to question
NI Teachers Collaborate	There are a number of more pressing concerns to be addressed in the proposed model before this can be considered.
South Eastern Regional College	There are a number of more pressing concerns to be addressed in the proposed model before this can be considered.

HOUSING SECTOR

Organisation name	Response
Co-Ownership Housing Association	It would be appropriate to prioritise those sectors which have the greatest number of complaints received, size complexity and risk to public service provision.
Clanmil Housing Association	No response to question
Choice Housing Association	Existing regulatory/legislative requirements should be acknowledged and considered prior to engagement with the housing sector. Given concerns we have highlighted regarding the loss of an investigation stage propelling complainants to NIPSO and the potential lengthy resolution times we would ask that more fundamental assessment of the proposals is undertaken prior to sector engagement.
Ark Housing Association	No
Northern Ireland Housing Executive (NIHE)	The Housing Executive has no specific views on this question. However, it may be of benefit to publish a proposed plan giving indicative times for each sector as soon as possible. This would allow organisations to effectively plan for any requirements which may be associated with any change, for example system procurement or internal policy/resource review.
Northern Ireland Federation of Housing Associations (NIFHA)	Existing regulatory or legislative requirements should be acknowledged and considered prior to engagement with housing sector. Given concerns highlighted regarding the loss of an investigation stage propelling complainants to NIPSO and the potential lengthy resolution times we would ask that more fundamental assessment of the proposals is undertaken prior to sector engagement.

LOCAL GOVERNMENT SECTOR

Organisation name	Response
Ards & North Down Borough Council	<p>Local Government would be a good place to start. Sector will be difficult to define through the volume of complaints at present as they may not have been reported as efficiently as they should have been to use this information.</p> <p>Risk is something that should always be mitigated and we feel that this is something that should always take priority, if the sector has a high risk section of the business this needs to be addressed and resolved as soon as possible as this may impact on public monies and the cost involved to resolve a complaint.</p> <p>ANDBC Council would be keen to review its complaints procedure but will await the MCHP for local government being published to ensure any new procedure we produce is in line with this. We would therefore ask that if local government is not the first sector NIPSO chooses to work with to introduce a MCHP that you give an indication of the timeframe within which the local government MCHP will be developed.</p>
Causeway Coast & Glens Borough Council	Favour NIPSO to start engagement on the co-development of MCHP for the Local Government/Council sector ASAP.
Lisburn & Castlereagh City Council	I think Local Government should be one of the first sectors especially as it is a political animal.
Newry, Mourne & Down District Council	Councils would expect to be considered as early adopters of the Model Complaints Handling Procedures.
Fermanagh & Omagh District Council	Another factor to consider would be the readiness of the sector to effect the required changes, as this would hopefully demonstrate an "early win" which could encourage other sectors to engage, and also to learn from

	that experience. The Local Government Sector would be in a position to roll out effective procedural change in a timely manner.
Mid & East Antrim Borough Council	Due to the diverse nature and number of services delivered by Council, it may be advantageous for a smaller public sector organisation type to pilot a Model Complaints Handling Procedure and lessons to be learnt before roll-out to the wider public sector.
Belfast City Council	Given that the majority of local authority complaints are relatively straightforward and that referrals to the NIPSO are quite low, council would encourage the NIPSO to consider local authorities to be in the first tranche of sectors to adopt the revised approach. The Belfast City Council has been considering a change to a two stage procedure for quite some time and is well placed to implement 5/20 format following co-design.
Antrim & Newtownabbey Borough Council	This seems a sensible approach, but the implementation timetable for all sectors should be as tight as possible, so that implementation does not take too long. For example, could implementation for some sectors be concurrent instead of sequential?
Mid Ulster Council	No response to question
Northern Ireland Local Government Officer's Superannuation Committee (NILGOSC)	Our preference is not to have to run two different processes depending on the type of complaint.

CENTRAL GOVERNMENT SECTOR

Organisation name	Response
Department of Education	No response to question
Department for Communities	No response to question
Department of Justice	No response to question
Department of Health	No response to question
Department for the Economy	We suggest that the nature of the complaints dealt with may also be relevant as complaints around policy may have different needs than those of customer service.
Labour Relations Agency (LRA)	No response to question
Land & Property Services (LPS)	Yes. This seems a sensible approach. LPS Complaints Procedures overlaps with NIPSO's guidance.
Northern Ireland Audit Office (NIAO)	NIAO would suggest that NIPSO should consider factors including: selecting the sector where there is the quickest win, where the case type is consistent and where there is a significant percentage of NIPSO cases.
Libraries Northern Ireland	No response to question
Probation Board for Northern Ireland	We would agree with that approach of prioritisation.
Consumer Council NI	We would agree that this approach is best perhaps the sector with the most complaints would benefit from a priority roll out than those who don't get as many.
National Museums NI	No response to question
Charity Commission for Northern Ireland (CCNI)	No comment on this issue.

OTHER

Organisation name	Response
Scottish Public Services Ombudsman (SPSO)	While the factors are reasonable, we encourage NIPSO to take a risk and impact based-approach which balances the impact achieved with the experience and learning of NIPSO to inform future development approaches.
Information Commissioner's Office (ICO)	No response to question
Alliance Party for Northern Ireland	Given the quieter summer months that the Education sector works within, starting with this sector could allow for more time to be given for assessment and evaluation of the complaints procedure.