

Question 5:

Are there any issues or concerns specific to any particular sector or area of work, that you feel NIPSO should take into account when refining MCHPs?

HEALTH SECTOR

Organisation name	Response
Northern Ireland Ambulance Service Trust (NIAST)	No
Southern Health & Social Care Trust (SHSCT)	<p>Questionnaire submission – Draft Model Complaints Handling Procedure SHSCT is regulated by the Department of Health (DoH) and its Regional Complaints Policy. Therefore, the Trust considers that DoH must review and respond to aspects of NIPSO's proposal. SHSCT has shared this with DoH and awaits its input. SHSCT will share with NIPSO any input received from DoH.</p> <p>Email submission – No response to question</p>
Northern Health & Social Care Trust (NHSCT)	No response to question
Health & Social Care Board (HSCB)	<p>The consultation document outlines how the NIPSO intends to take forward the approach to developing and bringing in the proposed changes as outlined within the documentation.</p> <p>The HSCB would suggest that there is a need for clarity of roles and responsibilities within the Model Complaints Procedure. Currently the HSCB has a clear role in terms of providing advice and support to FPS Practices in terms of the resolution of complaints. At times, given the monitoring arrangements that are in place between the HSCB and HSC Trusts, the HSC Trusts will seek advice in terms of suggested techniques for resolution, including the use of independent experts and independent</p>

	<p>laypersons. The suggested approach in the consultation documentation advises that a NIPSO Complaints Standards Team will be established which will as part of its role provide advice and guidance on good complaints handling.</p> <p>In addition the documentation refers to the team 'monitoring' practice and identifying trends in complaints handling. It is important to point out that the HSCB has a role in the oversight and monitoring of HSC Complaints. The need therefore for clarity and to ensure that there is no duplication or cause for confusion would be important.</p>
NHS	No
Woodbrooke Medical Practice	<p>As a partner of a public body providing GP services, I understand that complaints are a useful tool for feedback and learning on the care that we provide to our patients and service users. My surgery upholds an open and honest culture regarding complaints and I agree that a simplified, standardised complaint system across the public sector will make it easier for people to raise complaints.</p> <p>I am however concerned that while the proposed changes will allow this, they may also over complicate the current procedure making it a cumbersome process, particularly for stage 1 (previously informal) complaints which may then escalate, when they could have been easily resolved through prompt and proportionate handling. Further comments on the consultation are noted below.</p>
HSC Trust Complaints Forum	Any complaints procedure in Health and Social Care needs to be flexible to allow for complainants to come back to the Trust if unhappy to get clarity / meeting to give more detail etc. Around 15-20% of complainants will come back to the Trust with the majority of these resolved. Less than 1% ever progress to the Ombudsman.
Patient Client Council (PCC)	No response to question
General Medical Council (GMC)	We support the need to standardise complaints handling processes across the Health and Social Care (HSC) service in NI. We believe aligning processes can increase consistency, produce better results, and reduce duplication.

	<p>In 2019 we commissioned three independent reports, (Fair to refer; Independent review of gross negligence, manslaughter and culpable homicide; and Caring for doctors, Caring for patients) on how our Fitness to Practise processes could be fairer and more supportive.</p> <p>We suggest that, where possible, concerns and complaints should be addressed locally.</p> <p>The Independent report on gross negligence manslaughter and culpable homicide, found improvements arising from complaints most likely come through local investigations, focused on learning, not blame.</p> <p>Investigation teams require the appropriate experience, skills and competence (including understanding of human factors) to undertake investigations.</p> <p>It is also important that investigations take into account the context in which individuals work – with particular consideration given to the systemic factors that shape this. This includes local cultures, effective induction, feedback and ongoing support, particularly for staff at greater risk of isolation (as set out in our Fair to Refer report).</p> <p>Based on our experience and expertise we have published our Good Investigation Principles, which can be found here. These are the key principles that we believe should underpin investigations into concerns about fitness to practise.</p> <p>We welcome HSC organisations having effective oversight of their complaint processes, i.e. monitoring patterns in decision making and evaluation of the learning and reflection from complaints. We believe HSC organisations must lead in developing open cultures, in which candour is encouraged and learning from errors is enabled.</p>
Medical Protection Society (MPS)	<p>As outlined above, MPS has the below concerns which we believe NIPSO should take into account: (i) The need for flexibility in relation to timeframes given the complexity of complaints relating to clinical</p>

	care. (ii) Recognition of the nature of small health care organisations and the limited resources available.
Care Home Advice and Support NI (CHASNI)	Social Care particularly Care home related complaints Why are NIPSO not seeing larger numbers, we know its sector not fit for purpose so we should be seeing more directed to your office.

EDUCATION SECTOR

Organisation name	Response
Spires Integrated Primary School	<p>I do not believe it is fit for purpose in the education setting.</p> <p>This must not be statutory so that schools have the flexibility of applying the most suitable process for their setting, with an emphasis on what will work best for the whole school-community relationship.</p> <p>A revised procedure should be consulted upon, overseen and administered by the Department of Education and only upon its exhaustion should complaints be escalated to NIPSO.</p> <p>An education-specific advisory complaints procedure should instead be instated.</p> <p>The Informal Stage was seen as an important part of the process and is still needed. Sometimes parents only wish to be listened to and this is important.</p> <p>Serious concerns about the removal of the role of Boards of Governors in the early stages of the process.</p> <p>Deadline often not achievable and no acknowledgement of the fact that schools are closed completely over school holiday periods.</p> <p><i>There is such a focus on the complaints policy for schools however there is no policy for teachers & principals to complain about abusive or aggressive parents.</i></p> <p><i>The amount of work involved if a parent doesn't get the response they were hoping for from governors is incredible. Rather than appeal a decision where a second sub-committee could be set up the complaint goes straight to NIPSO who begin an investigation within unreasonable timeframes asking for huge amounts of paperwork. This is extremely stressful for the Principal and governors and as it is the chair of governors who needs to liaise with NIPSO via a secure channel this adds even more stress as documentation needs to be transferred securely from the school to the chair of governors who in turn uploads it to the NIPSO website.</i></p> <p>Confidentiality expected of schools as to the outcome of the NIPSO report, however, the Complainant can apparently make the outcome known to the Public without any sanctions. What sanctions can be imposed if any?</p>
Belfast Metropolitan College	<p>Yes, there are a number of concerns details below. Consideration should be given to existing good practice Overall we feel that a detailed, robust and tested joint sector complaints process is already in</p>

	<p>existence which could have informed this consultation process. We are not aware of any scoping exercise in advance of this consultation to consider tried and tested best practice in the public sector. We are open to and regularly review the learning from our complaints processes and make changes to our practices accordingly. These are audited at the highest level within the Colleges. We are happy to work with NIPSO to improve process however it may be that adapting areas to improve may be a more appropriate response than introducing new CHP. This said we are keen to highlight there are unique factors within the academic framework that would need to be considered in development / adaptation of any new process</p> <ol style="list-style-type: none"> 1. Paragraph 1 from MCHP (Flowchart): Strong concerns about stage 1 frontline and stage 2 investigation. These are not in line with existing sector policy. We believe further clarity needs to be provided on what constitutes a frontline complaint. (i.e. distinguish between lower level customer dissatisfaction and higher level customer complaint; which can be informal or formal.) Once frontline complaints are defined how would these be tracked and recorded 2. Paragraph 2 from MCHP; Resolution, concerns around joint decision between College and complainant of what outcome will be. How does NIPSO anticipate this will work in practice, particularly in the event it cannot be agreed? (The FE sector currently asks what complainant might feel would be a suitable resolution not mutually agreeing an outcome) 3. Paragraph 16 from MCHP There seems to be an emphasis on making a quick decision (for frontline complaint) when something appears clear cut and issuing immediate apology; we know we don't always get the full picture right away so would be wary of being rushed into apologising. There is also the issue of who may be issuing apologies ie decisions by front facing staff in resolving what may appear to be "frontline" complaints, potential issues around GDPR, confidentiality, consistency and transparency 4. Paragraph 9-19 from MCHP There does not appear to be a requirement for a central point of contact to make decisions, it appears that this would be left to staff, similarly no clarity on who (within the organisation) can/should escalate a complaint to stage 2 investigation. Paragraph 12 from MCHP It may be appropriate to signpost complainant to a different policy. Whilst it does reference potential unsuitability for treating as a complaint the next step appears to be straight to NIPSO; no reference to other organisational processes e.g. academic appeals, HR investigations, disciplinaries, etc.
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	<p>5. Paragraph 41 from MCHP; standard acknowledgement template is sufficient. The proposed timeframe and content is unworkable.</p> <p>6. Paragraph 47/48 from MCHP We have concerns re notifying staff members unnecessarily</p> <p>7. Paragraph 52 from MCHP Mediation is considered more appropriate to HR processes. If imposed under this model could incur cost implications.</p> <p>8. Paragraph 67 from MCHP Absence of an appeals stage is a major concern. As referenced above this is a key component of existing sectoral policy and works extremely well.</p> <p>9. Paragraph 69 from MCHP : clarity on when the 6 month period for raising a complaint with NIPSO; is it 6 months after organisation became aware of the matter or 6 months from the internal complaints process was exhausted?</p> <p>10. Appendix Paragraph 13 from MCHP Timeframe for raising complaints; the 6 month timeframe is a concern, particularly when working within the academic framework in a College setting. Our current joint sector policy stipulates that complaints should be raised within 3 months from the issue arising.</p>
Northern Regional College	<p>Yes, there are a number of concerns details below. Consideration should be given to existing good practice Overall we feel that a detailed, robust and tested joint sector complaints process is already in existence which could have informed this consultation process. We are not aware of any scoping exercise in advance of this consultation to consider tried and tested best practice in the public sector. We are open to and regularly review the learning from our complaints processes and make changes to our practices accordingly. These are audited at the highest level within the Colleges. We are happy to work with NIPSO to improve process however it may be that adapting areas to improve may be a more appropriate response than introducing new CHP. This said we are keen to highlight there are unique factors within the academic framework that would need to be considered in development / adaptation of any new process.</p> <p>1. Paragraph 1 from MCHP (Flowchart): Strong concerns about stage 1 frontline and stage 2 investigation. These are not in line with existing sector policy. We believe further clarity needs to be provided on what constitutes a frontline complaint. (i.e. distinguish between lower level customer dissatisfaction and higher level customer complaint; which can be informal or formal.) Once frontline complaints are defined how would these be tracked and recorded</p>

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South West College	<p>SWC outlines a number of concerns below. Consideration should be given to existing good practice. Overall we feel that a detailed, robust and tested joint sector complaints process is already in existence which could have informed this consultation process. We are not aware of any scoping exercise in advance of this consultation to consider tried and tested best practice in the public sector. We are open to and regularly review the learning from our complaints processes and make changes to our practices accordingly. These are audited at the highest level within the College. We are happy to work with NIPSO to improve process however it may be that adapting areas to improve may be a more appropriate response than introducing new CHP. This said we are keen to highlight there are unique factors within the academic framework that would need to be considered in development / adaptation of any new process</p> <ol style="list-style-type: none"> 1. Paragraph 1 from MCHP (Flowchart): SWC has strong concerns about stage 1 frontline and stage 2 investigation. These are not in line with existing sector policy. We believe further clarity needs to be provided on what constitutes a frontline complaint. (i.e. distinguish between lower level customer dissatisfaction and higher level customer complaint; which can be informal or formal.) Once frontline complaints are defined how would these be tracked and recorded 2. Paragraph 2 from MCHP; Resolution: SWC has concerns around joint decision between College and complainant of what outcome will be. How does NIPSO anticipate this will work in practice, particularly in the event it cannot be agreed? (The FE sector currently asks what complainant might feel would be a suitable resolution not mutually agreeing an outcome). 3. Paragraph 16 from MCHP There seems to be an emphasis on making a quick decision (for frontline complaint) when something appears clear cut and issuing immediate apology; we know we don't always get the full picture right away so would be wary of being rushed into apologising. There is also the issue of who may be issuing apologies ie decisions by front facing staff in resolving what may appear to be "frontline" complaints, potential issues around GDPR, confidentiality, consistency and transparency. 4. Paragraph 9-19 from MCHP There does not appear to be a requirement for a central point of contact to make decisions, it appears that this would be left to staff, similarly no clarity on who (within the organisation) can/should escalate a complaint to stage 2 investigation.
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	<p>5. Paragraph 12 from MCHP It may be appropriate to signpost complainant to a different policy. Whilst it does reference potential unsuitability for treating as a complaint the next step appears to be straight to NIPSO; no reference to other organisational processes e.g. academic appeals, HR investigations, disciplinaries, etc.</p> <p>6. Paragraph 41 from MCHP; standard acknowledgement template is sufficient. The proposed timeframe and content is unworkable.</p> <p>7. Paragraph 47/48 from MCHP We have concerns re notifying staff members unnecessarily</p> <p>8. Paragraph 52 from MCHP Mediation is considered more appropriate to HR processes. If imposed under this model could incur cost implications.</p> <p>9. Paragraph 67 from MCHP Absence of an appeals stage is a major concern. As referenced above this is a key component of existing sectoral policy and works extremely well.</p> <p>10. Paragraph 69 from MCHP : Clarity on when the 6 month period for raising a complaint with NIPSO; is it 6 months after organisation became aware of the matter or 6 months from the internal complaints process was exhausted?</p> <p>11. Appendix Paragraph 13 from MCHP Timeframe for raising complaints; the 6 month timeframe is a concern, particularly when working within the academic framework in a College setting. Our current joint sector policy stipulates that complaints should be raised within 3 months from the issue arising.</p>
Council for Catholic Maintained Schools (CCMS)	No response to question
Council for Curriculum, Examinations and Assessment (CCEA)	<p>It is our view that the NIPSO guidance should be explicit in assisting public service providers to manage expectations in the provision of services leading to regulated outcomes i.e. public examinations. CCEA operates in a highly regulated environment which includes post results and appeals services through the awarding body and also by the CCEA Regulation team. CCEA awarding organisation operates in a competitive marketplace in the UK. A complaints process should be explicit and clear on what can be provided to individuals in the interest of transparency and to avoid frustration during what can be a challenging time in young people's lives. CCEA would welcome clear guidance from NIPSO on how to manage these particular arrangements.</p>

Northern Ireland Council for Integrated Education (NICIE)	School holidays counting as working days, this be very difficult for schools and other educational organisations.
Education Authority (EA) Corporate Complaints Service	The EA Corporate Complaints Service have experienced an increase in communications from members of the public wanting to complain about Covid 19 related issues e.g. the use of face masks/testing in schools. However, these are not matters which can be processed under the EA's Complaints Handling Procedure but are matters for schools, DE or PHA guidance and customers are advised accordingly of this. Unfortunately, many parents are dissatisfied that the EA are not becoming involved in their concerns and accordingly the inclusion of guidance in the MCHP on when complainants disagree with the EA's decision not to process a complaint would be helpful.
Education Authority (EA) School Development Service	<p>School staff mostly have a full-time teaching complement and may not be available to manage complaints during this time - this may impact heavily on timescales.</p> <p>School holidays may be an issue when managing complaints - school principals are available to work at times during school holidays but other staff are on holiday during designated school holiday periods and not available to participate in investigations. School governors are also on holiday at these times. Therefore, schools could not commit to managing an investigation during defined holiday periods.</p> <p>School governors play an essential role in school leadership and management - their part in any complaints process should be clarified.</p>
National Association for Head Teachers Northern Ireland (NAHTNI)	Upon consideration of all the above, NAHT contends that the current proposal from NIPSO is not appropriate for the school context and must be amended. An education specific advisory complaints procedure should be instated. This must not be statutory so that schools have the flexibility of applying the most suitable process for their setting with an emphasis on what will work best for whole school community relationships.

	<p>This procedure should be consulted upon, overseen and administered by the Department of Education and only upon its exhaustion should complaints be escalated to NIPSO. There should be clear guidance around what type of complaints should be escalated to NIPSO and what the parameters for such complaints would be.</p> <p>A new complaints procedure administered by DE must include the following:</p> <p>An informal stage that emphasises the importance of relationships between school staff and parents and the wider school community</p> <p>The importance of Boards of Governors must be recognised and they must have an officially recognised stage in the process of complaint escalation</p> <p>Clear definitions of what specifically constitutes a complaint and the distinction between a complaint and a concern. We would recommend this is clearly laid out in tabular form as per the English model and that the contents are consulted upon with school leaders.</p> <p>NIPSO consultation response</p> <p>The evidence/information required to initiate a complaint is clearly stated in a manner that all potential parties can access and understand.</p> <p>Schools are provided with guidance on how vexatious and serial complaints should be handled and what assistance can be accessed should such situations escalate.</p> <p>A workload assessment and resulting clear guidance for schools in terms of workload, including paperwork, recording keeping etc. that may be generated by a complaints procedure. Resources must be made available so schools can obtain additional support with this if necessary. School leaders must not be expected to bear the undue and unquantified burden of this.</p>
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	<p>Who can investigate a complaint must be clearly defined and a workload impact for said individual(s) must be considered. The individual the complaint is about should not be involved in carrying out the investigation and a clear line of responsibility should be set out in the event of this scenario.</p> <p>A commitment must be given that any timescales for complaint handling must take account of school closure periods. Schools should not be expected to respond or undertake preparation of any associated paperwork during this time.</p> <p>Deadlines should be realistic and achievable and school leaders should be consulted on these in advance of them being set.</p> <p>An appeals process should be established in consultation with school leaders where it was felt that the NIPSO judgement was unfair.</p> <p>There should be clear sanctions should a complainant make details of their complaint public without the agreement or knowledge of the school. This should be outlined clearly to the complainant prior to engaging in the procedure.</p>
NI Teachers Collaborate	<p>Yes, there are a number of concerns details below. Consideration should be given to existing good practice Overall we feel that a detailed, robust and tested joint sector complaints process is already in existence which could have informed this consultation process. We are not aware of any scoping exercise in advance of this consultation to consider tried and tested best practice in the public sector. We are open to and regularly review the learning from our complaints processes and make changes to our practices accordingly. These are audited at the highest level within the Colleges. We are happy to work with NIPSO to improve process however it may be that adapting areas to improve may be a more appropriate response than introducing new CHP. This said we are keen to highlight there are unique factors within the academic framework that would need to be considered in development / adaptation of any new process</p>

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South Eastern Regional College	<p>Yes, there are a number of concerns details below. Consideration should be given to existing good practice Overall SERC feels that a detailed, robust and tested joint sector complaints process is already in existence which could have informed this consultation process. We are not aware of any scoping exercise in advance of this consultation to consider tried and tested best practice in the public sector. We are open to and regularly review the learning from our complaints processes and make changes to our practices accordingly. These are audited at the highest level within the College. We are happy to work with NIPSO to improve process however it may be that adapting areas to improve may be a more appropriate response than introducing new CHP. This said we are keen to highlight there are unique factors within the academic framework that would need to be considered in development / adaptation of any new process</p> <p>1. Paragraph 1 from MCHP (Flowchart): Strong concerns about stage 1 frontline and stage 2 investigation. These are not in line with existing sector policy. We believe further clarity needs to be provided on what constitutes a frontline complaint. (i.e. distinguish between lower level customer dissatisfaction and higher level customer complaint; which can be informal or formal.) Once frontline complaints are defined how would these be tracked and recorded</p> <p>2. Paragraph 2 from MCHP; Resolution, concerns around joint decision between College and complainant of what outcome will be. How does NIPSO anticipate this will work in practice, particularly in the event it cannot be agreed? (The FE sector currently asks what complainant might feel would be a suitable resolution not mutually agreeing an outcome)</p> <p>3. Paragraph 16 from MCHP There seems to be an emphasis on making a quick</p>

	<p>decision (for frontline complaint) when something appears clear cut and issuing immediate apology; we know we don't always get the full picture right away so would be wary of being rushed into apologising. There is also the issue of who may be issuing apologies ie decisions by front facing staff in resolving what may appear to be "frontline" complaints, potential issues around GDPR, confidentiality, consistency and transparency 4. Paragraph 9-19 from MCHP There does not appear to be a requirement for a central point of contact to make decisions, it appears that this would be left to staff, similarly no clarity on who (within the organisation) can/should escalate a complaint to stage 2 investigation. Paragraph 12 from MCHP It may be appropriate to signpost complainant to a different policy. Whilst it does reference potential unsuitability for treating as a complaint the next step appears to be straight to NIPSO; no reference to other organisational processes e.g. academic appeals, HR investigations, disciplinaries, etc. 5. Paragraph 41 from MCHP; standard acknowledgement template is sufficient. The proposed timeframe and content is unworkable. 6. Paragraph 47/48 from MCHP We have concerns re notifying staff members unnecessarily 7. Paragraph 52 from MCHP Mediation is considered more appropriate to HR processes. If imposed under this model could incur cost implications. 8. Paragraph 67 from MCHP Absence of an appeals stage is a major concern. As referenced above this is a key component of existing sectoral policy and works extremely well. 9. Paragraph 69 from MCHP : clarity on when the 6 month period for raising a complaint with NIPSO; is it 6 months after organisation became aware of the matter or 6 months from the internal complaints process was exhausted? 10. Appendix Paragraph 13 from MCHP Timeframe for raising complaints; the 6 month timeframe is a concern, particularly when working within the academic framework in a College setting. Our current joint sector policy stipulates that complaints should be raised within 3 months from the issue arising.</p>
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HOUSING SECTOR

Organisation name	Response
Co-Ownership Housing Association	<p>Co-Ownership plays a key role in the provision of affordable housing in Northern Ireland. As a registered housing association, it will fall under the housing sector. However, it should be borne in mind that our activities are significantly different to that of a more traditional type of housing association which provides social housing. Therefore, we would ask that in a housing sector approach that the differences in what we do as an organisation be taken into account.</p> <p>We would be happy to meet with representatives of the Public Services Ombudsman to discuss this further.</p>
Clanmil Housing Association	No response to question
Choice Housing Association	As housing providers we can have a "life time" relationship with tenants and as such we cannot "withdraw service" from complainants who are abusive /vexatious as other public bodies can. This can pose a particular difficulty for us in liaising with such complainants and be extremely stressful for staff. Given housing providers unique position in this regard we would welcome support and guidance in the review of "unacceptable actions policy".
Ark Housing Association	It is important to take into consideration the nature of repair reporting and timescales, as a majority of concerns raised by tenants would be due to these and clarification should be provided on whether they should be recorded as frontline complaints.
Northern Ireland Housing Executive (NIHE)	No comment other than those which have been raised elsewhere in the response.
Northern Ireland Federation of Housing Associations (NIFHA)	It is important to take into consideration the nature of repair reporting and timescales, a majority of concerns raised by tenants would be due to these and clarification should be provided on whether they should be recorded as frontline complaints.

	<p>As housing providers can have a 'lifetime' relationship with tenants and as such cannot 'withdraw service' from complainants who are abusive or vexatious as other public bodies can. This can pose a particular difficulty in liaising with such complainants and be extremely stressful for staff. Given housing providers unique position in this regard we would welcome support and guidance in the review of 'unacceptable actions policy'.</p>
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LOCAL GOVERNMENT SECTOR

Organisation name	Response
Ards & North Down Borough Council	<p>Consistency of approach, classification of complaints and reporting is essential to make this review of value and to ensure that NIPSO are getting the best information at source. When defining the issue or concern there should be drop down option that will take you to the process relevant to your sector. Is there a suggestion that the MCHP would be a centralised form that people use and then select the particular public body they want to complain about?</p> <p>It is important that this process is as simple as possible for everyone to understand. You need this to be as simple as possible for both the Authority and the customer to understand.</p> <p>More guidance around social media complaints?</p>
Causeway Coast & Glens Borough Council	Planning complaints, in particular, are complex and many require responses from different departments leading to it taking longer than 20 working days to resolve. Model CHP provides for this in that these can be moved to stage 2 of the CHP with the inbuilt mechanism to extend a complaint resolution deadline where appropriate.
Lisburn & Castlereagh City Council	NIPSO should consider political intervention when refining the MCHP for Local Government.
Newry, Mourne & Down District Council	There is a concern at the misuse of the complaints process to provide a means to interfere with the normal land use planning mechanisms. Forms of Alternative Dispute Resolution should be offered where this is an appropriate mechanism.
Fermanagh & Omagh District Council	The signposting role to other complaints resolution mechanisms where appropriate.

Mid & East Antrim Borough Council	NIPSO should take into account the diverse nature and number of services delivered by a Council when developing Model Complaints Handling Procedures.
Belfast City Council	Yes, it will be important that all services within local authorities are considered in the co-design phase, encompassing and taking account of both the more operationally focused "frontline services" as well as the more complex service providers such as, planning, building control and environmental health.
Antrim & Newtownabbey Borough Council	No, we have no individual comments to make, we feel that NIPSO have been thorough in their approach.
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. The majority of complaints that NILGOSC receives relate to ill-health retirement and this is a highly complex area dependent on both assessments and medical reports from health professionals, all of which takes a significant amount of time.

CENTRAL GOVERNMENT SECTOR

Organisation name	Response
Department of Education	No response to question
Department for Communities	It would be helpful if additional guidance was made available regarding Alternative Complaint Resolution Approaches for those cases where the Department may require a different approach to resolving complex complaints.
Department of Justice	No response to question
Department of Health	<p>I understand NIPSO staff are already members of the HSC CPLG. This group, which is made up of the key stakeholders from across the HSC, was originally established to take forward the review of the 2009 HSC Complaints Procedure and now promotes improvement and best practice in complaints handling and management across the HSC. This group would be best placed, and I know is ready, to work with the Ombudsman's Complaints Standards Team to co-develop the new complaints handling procedure for the health and social care sector.</p> <p>I also welcome the development of a selection of training packages and guides to support staff in their complaints handling roles. It is important to invest in our complaints staff ensuring they are valued and equipped to act decisively to resolve complaints, with a focus on further developing those skills at the frontline.</p> <p>Finally, as you will be aware, the current HSC Complaints Procedure is underpinned by a number of legislative Directions. These Directions will need to be reviewed and updated to reflect any changes to the HSC processes as a result of the roll-out and implementation of a new HSC Complaints Handling Procedure.</p>
Department for the Economy	None that we are aware of.
Labour Relations Agency (LRA)	No response to question
Land & Property Services (LPS)	None

Northern Ireland Audit Office (NIAO)	N/A
Libraries Northern Ireland	No response to question
Probation Board for Northern Ireland	There are no issues we wish to raise.
Consumer Council NI	Vulnerable consumers - it may be worth having some specific guidance around making sure your process is accessible and that both the process and the organisation must be flexible when it comes to complaints to suit/cater for different vulnerabilities. For some sectors this might be more relevant than others.
National Museums NI	No response to question
Charity Commission for Northern Ireland (CCNI)	Given the experiences of the Charity Commission for Northern Ireland in managing complaints about service, it would be helpful for NIPSO to give the following issues consideration when refining the MCHPs: 1) Guidance on managing unreasonable complainant conduct. 2) Guidance on finding a way to draw a line and cease dealing with a complainant past a certain point, for example repetitive complaints, complaints which cover the same issues but are from different individuals suspected to be working in concert, complaints which are vexatious or lack evidence. 3) Guidance on ensuring a fair complaints process alongside a duty of care for staff where they are named in complaints which are being used to vent frustration with a decision and blame individual staff. 4) Overlap between complaints about service and/or information requests and concerns/whistleblowing. 5) Ability of some complainants to blur the lines. 6) Problems with complaints being addressed to Board members, who work on a limited, part time basis, and the time required for this work. For example complainants may refuse to have complaints dealt with by staff members and instead request a Board level intervention. 7) Where would this fall within the complaints handling procedure or would there be guidance on the staff level at which complaints are investigated? 8) Overlap between what the Charity Tribunal has previously considered regarding charity regulation and what NIPSO considers falls within its ambit of adjudicating on public administration.

OTHER

Organisation name	Response
Scottish Public Services Ombudsman (SPSO)	Our understanding of the context within which NIPSO works is limited but we have found areas where services are delivered through joint working, particularly joint working across sector, can cause difficulties from a complaints handling perspective. We have included suggestions for managing these situations in the relevant models.
Information Commissioner's Office (ICO)	No response to question
Alliance Party for Northern Ireland	Will the current strain on the health service be taken into account when dealing with investigations? Should this be detailed from the outside to complainants? Will the need for additional resourcing in terms of complaints by Health Trusts be highlighted in order to ensure investigations are not held up ensuring full openness, transparency and accountability within our Health and Social Care system at this critical time.