



Northern Ireland

**Public Services**  
Ombudsman

# **Investigation of a complaint against a Secondary School**

**Report Reference: 202001752**

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## **The Role of the Ombudsman**

The Northern Ireland Public Services Ombudsman (NIPSO) provides a free, independent and impartial service for investigating complaints about public service providers in Northern Ireland.

The role of the Ombudsman is set out in the Public Services Ombudsman Act (Northern Ireland) 2016 (the 2016 Act). The Ombudsman can normally only accept a complaint after the complaints process of the public service provider has been exhausted.

The Ombudsman may investigate complaints about maladministration on the part of listed authorities, and on the merits of a decision taken by health and social care bodies, general health care providers and independent providers of health and social care. The purpose of an investigation is to ascertain if the matters alleged in the complaint properly warrant investigation and are in substance true.

Maladministration is not defined in the legislation, but is generally taken to include decisions made following improper consideration, action or inaction; delay; failure to follow procedures or the law; misleading or inaccurate statements; bias; or inadequate record keeping.

The Ombudsman must also consider whether maladministration has resulted in an injustice. Injustice is also not defined in legislation but can include upset, inconvenience, or frustration. A remedy may be recommended where injustice is found as a consequence of the failings identified in a report.

## **Reporting in the Public Interest**

This report is published pursuant to section 44 of the 2016 Act which allows the Ombudsman to publish an investigation report when it is in the public interest to do so.

The Ombudsman has taken into account the interests of the person aggrieved and other persons prior to publishing this report.

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## SUMMARY

This investigation related to how the school handled a complaint it received from a parent of a pupil. The genesis of this complaint started following the end of a separate complaints process and appeal relating to how the School awarded 'Centre Assessment Grades'<sup>1</sup> (CAG) to the complainant's daughter (the pupil) in 2020. CAG was used to award grades to pupils who were unable to sit examinations in 2020 due to the COVID-19 pandemic. The complainant made a separate complaint to the School about the CAG. She also appealed to the Council for the Curriculum, Examinations and Assessment<sup>2</sup> (CCEA) following the end of the School's examinations complaints process. While the CAG forms part of the background to the complaint, this investigation related to how the School handled the complaint raised following completion of the CAG appeal to CCEA.

Following receipt of the complaint, the Principal considered the issues and responded to the complainant in line with Stage One of the complaints procedure. The complainant was not satisfied with how the School responded to her complaint and pursued the matter to the Board of Governors (BoG). She raised concerns with how the School dealt with both stages of the process.

I upheld the complaint. The investigation found the School failed to address all issues within the complaint. It also found the BoG failed to arrange for a sub-committee to investigate the complaint, which called into question the fairness and independence of the process. The School also failed to signpost the complainant to NIPSO in line with the requirements of the 2016 Act.

I made a number of recommendations, including an apology to the complainant for the maladministration and failures identified.

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<sup>1</sup> The teachers' role was to exercise holistic professional judgement on the question of what grade a pupil would most likely have achieved had they sat the summer 2020 examinations. The school, or exam centre, submitted assessed grades for each pupil, in rank order, which would then be subjected to standardisation by CCEA before results were issued to pupils.

<sup>2</sup> An awarding body in Northern Ireland. It develops and delivers qualifications, including GCSEs, AS, and A Levels, and provides curriculum support and assessments for schools.

## THE COMPLAINT

1. This complaint was about how a secondary school handled a complaint it received in June 2021. The complainant is the parent of a young person who was a pupil (the pupil) at the School.

### Background

2. The pupil lives with dyslexia and other medical conditions and is accepted as having special educational needs (SEN). At the time of the events in the complaint, the pupil was in her final year (September 2019 to June 2020) at the School, studying A-levels. The events under investigation took place during the Covid-19 pandemic which caused significant disruption to the education of pupils and the work of the School from March 2020 onwards.
3. In March 2020, the Department for Education instructed the examination body, the Council for the Curriculum, Examinations and Assessment (CCEA), to introduce 'centre assessment grades'<sup>3</sup> (CAG) in A-level subjects for pupils instead of examinations. CCEA issued pupils with results after standardisation<sup>4</sup> on 13 August 2020.
4. The Minister for Education, after some public controversy, announced on 17 August 2020 that pupils would be awarded whichever grade was higher; that being, the School determined grade, or the grade CCEA calculated after standardisation.
5. The pupil and complainant remained dissatisfied with the grade the School determined. The complainant first challenged the assessed grades under the School's examination complaints procedure, with the consent of the pupil. The complainant lodged an appeal on receipt of the outcome of the examination

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<sup>3</sup> The role of teachers was to exercise their holistic professional judgement on the question of what grade a pupil would most likely have achieved had they sat the summer 2020 examinations. The school, or exam centre, submitted assessed grades for each pupil, in rank order, which would then be subjected to standardisation by CCEA before results were issued to pupils.

<sup>4</sup> A process by which the exam board reviewed proposed marks, reviewed prior knowledge of the student's attainment, and prior marks in the school/subject. This is applied by a mathematical algorithm.

complaint. CCEA considered the appeal further from September 2020 until February 2021. CCEA did not change the grade awarded by the School.

6. The complainant disputed the accuracy of some of the documents she obtained during the assessed grade appeal process and in Fol responses. She also questioned the veracity of the documents. She stated that the documents established that staff had been biased against the pupil and had not taken account of her SEN in arriving at the CAG. The complainant raised her concerns with the Information Commissioner's Office (ICO) about the documents she was provided with. The ICO instructed the School to disclose further information to the complainant.
7. Following the conclusion of the appeal to CCEA regarding the CAG, the complainant submitted a new complaint to the Principal on 14 June 2021 under the School's Complaints procedure. She supplemented the complaint in writing on 24 June 2021 after she received information during the examination grade appeals process and following receipt of Freedom of Information requests (Fol). The Principal provided a response on 3 August 2021.
8. The complainant remained dissatisfied and asked for her complaint to be progressed to the Chair of the Board of Governors (BoG) on 16 August 2021, supplemented in writing on 23 August 2021 and 27 September 2021. The Chair of the BoG responded to the complainant on 21 September 2021 and finally on 6 October 2021. It is how the School handled this complaint, lodged on 14 June 2021, which is the subject of this report.

### **Issues of Complaint**

9. I accepted the following issues of complaint for investigation:

**Issue 1: Whether the Principal handled the complaint submitted on 14 June 2021 and the addendum dated 24 June 2021, in accordance with relevant policies and procedures?**

**Issue 2: Whether the BoG handled the complaints and addendum submitted on 16 August 2021, 23 August 2021 and 27 September 2021 in accordance with relevant policies and procedures?**

## **INVESTIGATION METHODOLOGY**

10. To investigate this complaint, the Investigating Officer obtained from the School all relevant documentation together with its comments on the issues the complainant raised. This documentation included information relating to the School's handling of the complaint.

### **Relevant Standards and Guidance**

11. To investigate complaints, I must establish a clear understanding of the standards, both of general application, and those which are specific to the circumstances of the case. I also refer to relevant regulatory, professional and statutory guidance.

12. The general standards are the Ombudsman's Principles<sup>5</sup>:

- The Principles of Good Administration
- The Principles of Good Complaints Handling

13. The specific standards and guidance referred to are those which applied at the time the events occurred. These governed the exercise of the administrative functions of those individuals whose actions are the subject of this complaint.

14. The specific standards and guidance relevant to this complaint are:

- The School's Complaints Procedure, based on a model policy circulated to by the Education Authority (EA) 2021 (School's Complaints Procedure).
- The School's Learning and Teaching Policy 2017 (L&T Policy).

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<sup>5</sup> These principles were established through the collective experience of the public services ombudsmen affiliated to the Ombudsman Association.

- The Education Authority’s Guidance on the School Model Complaints Procedure 2021 (EA Complaints Guidance).
  - The Department of Education’s ‘Every School a Good School’ -The Governors’ Role: A Guide for Governors, 2010 (as revised) (DoE guidance).
15. In investigating a complaint of maladministration, my role is concerned primarily with an examination of the administrative actions of the School. It is not my role to question the merits of a discretionary decision taken unless that decision was attended by maladministration.
16. I did not include all information obtained in the course of the investigation in this report. However, I am satisfied I took into account everything I considered to be relevant and important in reaching my findings.
17. A draft copy of this report was shared with the complainant and the School for comment on factual accuracy and the reasonableness of the findings and recommendations.

## **THE INVESTIGATION**

**Issue 1: Whether the Principal handled the complaint submitted on 14 June 2021 and the addendum dated 24 June 2021, in accordance with relevant policies and procedures?**

### **Detail of the Complaint**

18. The complaint, submitted to the school in June 2021, related to written comments in minutes from a meeting of one of the School’s departments, which took place on 17 January 2021. It also related to issues that flowed from the wording in the minutes. The complainant said in her complaint that the School did not provide her with the full minutes of the meeting. Arising from details contained in the minutes, the complainant raised several issues relating to the pastoral care of the pupil, follow-up with her parents, and delays in making the minutes available.



19. The complainant said the Principal's response, on behalf of the School, to her complaint failed to answer her questions.

## **Evidence Considered**

### **Legislation/Policies/Guidance**

20. I considered the following policies and guidance:

- School's Complaints Procedure
- EA Complaints Guidance

I enclose the relevant extracts of the guidance considered at Appendix three to this report. Both the EA Complaints Guidance and the School's Complaints Procedure set out a two-stage process. The School's procedure indicates it should issue a Stage One response within 20 school working days. The same timescale is applicable to the Stage Two response.

### **The School's response to investigation enquiries**

21. The School summarised the avenues of redress the complainant pursued.
22. The School stated it undertook '*a comprehensive review as part of our appeal process*'. It provided a detailed commentary on the issues the complainant raised with NIPSO.
23. The Chair of the BoG further indicated, "*In dealing with these complaints/issues the School has given proper and full consideration in that regard and there is nothing substantive from the School's perspective that could be determined to have resulted in any injustice given the meaningful consideration of all the requests...since August 2021 to date*".
24. The Chair of the BoG further stated in response to the Investigating Officer's queries, "*we have presented all the information we have available to [the complainant] over the course of her requests and complaints in the past two/three years.*"

25. The Chair of the BoG outlined the process followed: *“the Principal did handle the complaint in line with the School Complaints Process...the School reminded [the complainant] of the complaints process and requested that she submit her complaint in line with that process”*.

### **Relevant records**

26. In order to understand the background to the issues that gave rise to the complaint to NIPSO, I reviewed documents relating to the complainant’s CAG complaint and appeal, which took place from late 2020. Issues relating to the CAG did not form part of the investigation of this complaint. I enclose a chronology outlining how the School managed the complaint prior to it being submitted to NIPSO at appendix four to this report.

### **Analysis and Findings**

27. The Principal responded on behalf of the School to the complaint submitted on 14 June 2021 in a letter dated 3 August 2021. The School’s Complaints Procedure states the School will respond to a Stage One complaint within 20 working days. It also states that school holidays may impact this timeframe. The School received the complaint two weeks before it started its summer break. Therefore, the procedure would have permitted the School to respond to the complaint in September 2021. Given the Principal responded to the complaint on 3 August 2021, I am satisfied the School issued its response within the timeframe set out in its Complaints Procedure.
28. The complainant was concerned the Principal’s response to her complaint did not fully address her issues. Having reviewed the minutes and the response to the complaint, I am satisfied the Principal’s letter deals with the central issue of the “terminology” used to refer to the pupil in the departmental meeting minutes. The Principal formed a judgement that the language used is *“quite strong and the comments could have been made in a different way, however the intent was to express concern”*. This appears to suggest a considered balanced judgement on the wording used. The Principal goes on to conclude *“The intent was to show concern about [the pupil’s] performance, which I am of the view was warranted.”* This is a judgement the Principal made in her

consideration of the complaint and the minutes. Therefore, I am satisfied the Principal considered and responded to this particular issue of the complaint.

29. The complainant in her letter of 14 June 2021 raised other matters beyond the “terminology” used in the minutes of the school department meeting. These included the actions of staff where there were concerns about pupil performance; contact and follow up with parents; and an explanation of why the document had not been furnished in an unredacted form earlier. The Principal did not address these matters in the stage one response to the complaint dated 3 August 2021. I have not established any reasonable explanation for this omission.
30. I have no reason to doubt the Principal was aware of materials generated when the School exam grade appeal took place. Regrettably, there is no note of what specific material the Principal considered during the complaints process, or any fresh investigation she pursued. I do not expect a complaint file to contain a detailed commentary on every action taken, or a detailed analysis of every document reviewed. However, I would expect the record of a complaint investigation to enable anyone who reviews it to determine the key actions taken, the documents reviewed, and a consideration of each of the issues raised in the complaint. In addition, the investigator’s decision on each issue should be clear and supported by relevant evidence. The necessary level of detail is absent in the records created by the Principal. As such, I have not been able to conclude the Principal fully considered the issues raised in the complaint.
31. I also note the Stage One response from the Principal failed to signpost the complainant to the remaining stages of the School’s Complaint Procedure and the further avenues available to her. Prior email communication between the secretary to the BoG and the complainant indicated and summarised the complaints process. However, the Stage One response should have contained information on what steps the complainant should take if she remained dissatisfied.

32. I consider that in failing to address all points raised in the complaint in its Stage One response, the School fell short of the standards required by the Principles of Good Complaint Handling. Specifically, the first Principle, '*Getting it right*' requires a public body to act in accordance with its own policy and guidance; take proper account of established good practice; and take reasonable decisions, based on all relevant considerations.
33. The First Principle of Good Complaints Handling also requires the School to signpost complainants to the next stage of the complaints procedure in the right way and at the right time. I acknowledge there were earlier emails from the School outlining the procedure. However, it is important that signposting takes place in the context of the Stage One response and outlines how the complainant can take the matter further.
34. I also consider the Stage One response fell short of the standards required by the fourth Principle, 'Acting fairly and appropriately' and ensuring that complaints are investigated thoroughly and fairly to establish the facts of the case. There is no evidence of what material the Principal considered, what additional investigation, if any, took place, and why the response failed to address some issues raised in the complaint. The EA Complaints Guidance that supplements the model complaints procedure indicates the steps to take at Stage One of the School's Complaint Procedure. This is set out at Appendix 3 below.
35. I consider the failures highlighted above constitute maladministration. I therefore uphold this element of complaint.

### ***Injustice***

36. I consider the complainant sustained the injustice of frustration and a lost opportunity to have all her outstanding issues properly addressed at Stage One of the School's Complaints Procedure.

**Issue 2: Whether the BoG handled the complaints and addendum submitted on 16 August 2021, 23 August 2021 and 27 September 2021 in accordance with relevant policies and procedures?**

**Detail of Complaint**

37. The complainant wrote to the Chair of the BoG in August 2021 following receipt of the School's Stage One response on 3 August 2021. The complainant detailed her dissatisfaction with the Principal's response and raised further matters.
38. The complainant said the School was "disrespectful" in dealing with her complaint. She considered it did not respond to the issues raised. She felt the School exhibited "unconscious bias" in failing to consider her points.
39. The complainant further raised that the response did not provide any information on how she could progress her complaint. She said it did not signpost her to NIPSO.

**Evidence Considered**

**Legislation/Policies/Guidance**

40. I considered the following policies and guidance:
- School's Complaints Procedure.
  - EA Complaints Guidance.
- I enclose the relevant extracts at Appendix three to this report.

**The School's response to investigation enquiries**

41. In response to enquiries, the School summarised the other avenues of redress the complainant had pursued.
42. Further, the School stated, "*we have considered this complaint and also undertaken a comprehensive review as part of our appeal process*".

43. The School stated it used its Complaints Procedure to deal with the matters the complainant raised.

### **Relevant records**

44. I reviewed documents provided by the School in relation to this complaint.

### **Analysis and Findings**

45. Following her receipt of the School's Stage One response, the complainant remained dissatisfied and escalated her complaint to Stage Two of the School's Complaints Procedure. I note that within her letter to the Chair of the BoG, dated 16 August 2021, and her addendum, dated 23 August 2021, the complainant outlined her specific dissatisfaction with the Principal's handling of the matter.
46. The School's Complaints Procedure states that at Stage Two, *'the Chairperson will convene a committee to review the complaint'*. However, the records evidence upon receipt of the complaint, the Chair provided his own response without convening a committee. I find this concerning. The Complaints Procedure makes no reference to the Chair exercising a "filter" role in the process. One of the purposes of a sub-committee is to ensure the complaint is dealt with fairly and independently. I consider the omission of this step calls into question the fairness of the Stage Two process.
47. I consider the records do not evidence that the BoG followed the process set out in the School's Complaints Procedure for the management of a Stage Two complaint. In addition to not setting up a sub-committee, there is no evidence to suggest the BoG carried out any investigation of the issues the complainant raised.
48. In escalating her complaint to Stage Two, the complainant also raised concerns about how the Principal dealt with the complaint at Stage One. The School's Complaints Procedure states that *'where a complaint relates to the Principal the matter will be dealt with formally by the Board of Governors'*. However, there is

no evidence to suggest the Chair of the BOG gave any consideration to whether the complainant's concerns regarding the Principal amounted to a new complaint, or could be considered as a new issue, as part of the Stage Two response.

49. Instead of taking action in line with the Complaints Procedure, the Chair of the BoG wrote to the complainant to advise the School had already dealt with her complaint by way of the earlier School assessment grade complaint and appeals process. However, it is clear the concerns the complainant raised in her complaint, which she escalated to the BoG at Stage Two, were not a further appeal of the pupil's centre assessment grade complaint but were distinct and different.
50. My review of the written correspondence from the Chair of the BoG identified that he did not signpost the complainant to my Office. In accordance with Section 25 of the 2016 Act, Schools have a statutory obligation to provide '*written notice*' of this right to complainants within two weeks of the day in which the procedure is exhausted. This notice must advise complainants of their right to approach NIPSO when the complaints procedure has been completed. I am satisfied the School failed to provide this notice to the complainant in accordance with the 2016 Act.
51. In my review of the complaint, I noted the School was due to revise its Complaints Procedure in 2018. I note it recently published a revised complaints procedure, dated June 2024. It is disappointing the School took six years to review its procedure. I wish to remind the School that it is important for public bodies to seek continuous improvement. This includes conducting regular reviews of their policies to ensure they are effective, reflect changes to law and good practice, and incorporate learning previously identified.
52. I consider the School's position that it handled the complaint appropriately is untenable. It is clear it did not act in accordance with its Complaints Procedure in its management of stage two of the process. While the procedure sets out

governance arrangements, its achievement against those arrangements in this case is poor.

53. I consider the arrangements around the School's Complaints Procedure did not meet the standards of the Principles of Good Complaints Handling; specifically, the first, second and third Principles. The First Principle 'Getting it right' requires public bodies to ensure that those at the top of the public body provide leadership to support good complaint management. Also, to develop an organisational culture that values complaints and signposts to the next stage of the complaints procedure in the right way and at the right time. The Second Principle, 'Being customer focused' requires public bodies to ensure that service users can easily access the service dealing with complaints and inform them about advice and advocacy services where appropriate. The Third Principle, 'Being open and accountable' directs public bodies to publish clear, accurate and complete information about how to complain, and how and when to take complaints further. Furthermore, the sixth principle of Good Administration requires bodies to seek continuous improvement by regularly reviewing and updating their policies and procedures. I consider the failures identified constitute maladministration. I therefore uphold this element of the complaint.

### ***Injustice***

54. I consider the complainant sustained the injustice of frustration as well as additional time and trouble in attempting to pursue the complaint.

## **CONCLUSION**

55. I received a complaint about the actions of the School. The complainant said the School did not appropriately manage her complaint. I found the following maladministration in how the School handled the complaint:

- The Principal failed to manage Stage One of the complaint in accordance with the School's Complaints Procedure. In particular, the Principal did not respond to all issues raised in the complaint.



- The Chair of the BoG failed to implement the arrangements for the management of a complaint at Stage Two as outlined in the School's Complaints Procedure. Specifically, the BoG did not appoint a sub-committee to consider the complaint, conduct an investigation, or signpost the complainant to NIPSO at the end of the School's Complaints Procedure.
56. I am satisfied the maladministration identified caused the pupil to sustain the injustice of upset and the loss of opportunity for having the complaint issues addressed properly. I am also satisfied it caused the complainant to sustain the injustice of frustration, loss of opportunity to have the complaint issues addressed properly, and additional time and trouble.
57. To ensure there is clarity about the jurisdiction of my Office, I refer to Section 5 of the Public Services Ombudsman Act (Northern Ireland) 2016. This section makes clear that the role of NIPSO is to investigate complaints of alleged maladministration made by a person aggrieved. The primary purpose of an investigation is to determine whether the matters alleged are in essence true. In this case, the investigation of the complaint did not consider any legal proceedings between the complainant and the School. Instead, the investigation focused on how the School managed the complaint initiated on 14 June 2021. Legal proceedings between the complainant and the School are outside my jurisdiction.
58. As outlined above the focus of this investigation and report was to consider allegations in a complaint made to NIPSO of maladministration in how the School handled a complaint. I would observe that the School and the Chair BoG may find it instructive to consider the School Complaints Case Digest NIPSO produced in 2023, which sets out NIPSO's role and relevant considerations in school complaints.

## Recommendations

59. I recommend that:

- i. The BoG provides the complainant with a written apology in accordance with NIPSO's 'Guidance on issuing an apology' (July 2019), for the injustice caused as a result of the maladministration and failures identified (within **one month** of the date of this report).
- ii. I note the School implemented its revised Complaints Procedure in June 2024, which now signposts complainants to NIPSO. If it has not already done so, the School should arrange to deliver training to senior leadership, relevant staff and its BoG on the revised procedure. The training should include the importance of:
  - Conducting a fair and robust investigation.
  - Fully addressing all issues raised within the complaint response.
  - Signposting complainants to NIPSO in the letter outlining their final decision on the complaint.

60. I recommend that the School implements an action plan to incorporate my recommendations and should provide me with an update within **three** months of the date of my final report. That action plan should be supported by evidence to confirm that appropriate action has been taken (including, where appropriate, records of any relevant meetings, training records).

61. As outlined previously in this report, the School did not respond to all issues the complainant raised in its Stage One response. This was not rectified at Stage Two by the Chair of the BOG. It is therefore the case that a number of the issues the complainant raised have never been responded to nor was the issue about how the Principal dealt with the complaint at Stage One considered. This is particularly unsatisfactory and still concerns the complainant. However, given the passage of time, and the events that have occurred in that time, I do not consider it appropriate, practical or in the best interests of the individuals involved to recommend the BoG revisits its decision on this occasion. The School's Principal has since retired. The complainant informed my Office she wanted the BoG to take accountability for any maladministration identified. She also informed my Office she wanted to prevent similar maladministration

occurring in the future. I am satisfied my recommendations provide the complainant with the necessary reassurance in this respect.

**SEAN MARTIN**  
**Deputy Ombudsman**

**April 2025**

## **Appendix 1**

### **PRINCIPLES OF GOOD ADMINISTRATION**

**Good administration by public service providers means:**

#### **1. Getting it right**

- Acting in accordance with the law and with regard for the rights of those concerned.
- Acting in accordance with the public body's policy and guidance (published or internal).
- Taking proper account of established good practice.
- Providing effective services, using appropriately trained and competent staff.
- Taking reasonable decisions, based on all relevant considerations.

#### **2. Being customer focused**

- Ensuring people can access services easily.
- Informing customers what they can expect and what the public body expects of them.
- Keeping to its commitments, including any published service standards.
- Dealing with people helpfully, promptly and sensitively, bearing in mind their individual circumstances
- Responding to customers' needs flexibly, including, where appropriate, co-ordinating a response with other service providers.

#### **3. Being open and accountable**

- Being open and clear about policies and procedures and ensuring that information, and any advice provided, is clear, accurate and complete.
- Stating its criteria for decision making and giving reasons for decisions
- Handling information properly and appropriately.
- Keeping proper and appropriate records.
- Taking responsibility for its actions.

#### **4. Acting fairly and proportionately**

- Treating people impartially, with respect and courtesy.
- Treating people without unlawful discrimination or prejudice and ensuring no conflict of interests.
- Dealing with people and issues objectively and consistently.
- Ensuring that decisions and actions are proportionate, appropriate and fair.

#### **5. Putting things right**

- Acknowledging mistakes and apologising where appropriate.
- Putting mistakes right quickly and effectively.
- Providing clear and timely information on how and when to appeal or complain.
- Operating an effective complaints procedure, which includes offering a fair and appropriate remedy when a complaint is upheld.

#### **6. Seeking continuous improvement**

- Reviewing policies and procedures regularly to ensure they are effective.
- Asking for feedback and using it to improve services and performance.
- Ensuring that the public body learns lessons from complaints and uses these to improve services and performance.

## **Appendix 2**

### **PRINCIPLES OF GOOD COMPLAINT HANDLING**

**Good complaint handling by public bodies means:**

#### **1. Getting it right**

- Acting in accordance with the law and with regard for the rights of those concerned.
- Ensuring that those at the top of the public body provide leadership to support good complaint management and develop an organisational culture that values complaints.
- Having clear governance arrangements, which set out roles and responsibilities, and ensure lessons are learned from complaints.
- Including complaint management as an integral part of service design.
- Ensuring staff are equipped and empowered to act decisively to resolve complaints.
- Focusing the outcomes for the complainant and the public body.
- Signposting to the next stage of the complaints procedure in the right way and at the right time.

#### **2. Being customer focused**

- Having clear and simple procedures.
- Ensuring that complainants can easily access the service dealing with complaints and informing them about advice and advocacy services where appropriate.
- Dealing with complainants promptly and sensitively, bearing in mind their individual circumstances.
- Listening to complainants to understand the complaint and the outcome they are seeking.
- Responding flexibly, including where appropriate co-ordinating responses with any other bodies involved in the same complaint, where appropriate.

#### **3. Being open and accountable**

- Publishing clear, accurate and complete information about how to complain, and how and when to take complaints further.

- Publishing service standards for handling complaints.
- Providing honest evidence-based explanations and giving reasons for decisions.
- Keeping full and accurate records.

#### **4. Acting fairly and proportionately**

- Treating the complainant impartially, and without unlawful discrimination or prejudice.
- Ensuring that complaints are investigated thoroughly and fairly to establish the facts of the case.
- Ensuring that decisions and actions are proportionate, appropriate and fair.
- Ensuring that complaints are reviewed by someone not involved in the events leading to the complaint.
- Acting fairly towards staff complained about as well as towards complainants.

#### **5. Putting things right**

- Acknowledging mistakes and apologising where appropriate.
- Providing prompt, appropriate and proportionate remedies.
- Considering all the relevant factors of the case when offering remedies.
- Taking account of any injustice or hardship that results from pursuing the complaint as well as from the original dispute.

#### **6. Seeking continuous improvement**

- Using all feedback and the lessons learnt from complaints to improve service design and delivery.
- Having systems in place to record, analyse and report on learning from complaints.
- Regularly reviewing the lessons to be learnt from complaints.
- Where appropriate, telling the complainant about the lessons learnt and the changes made to services, guidance or policy.

