



BEST PRACTICE GUIDANCE:

Learning from
Complaints



Northern Ireland
Public Services
Ombudsman

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INTRODUCTION

WELCOME TO THIS GUIDE

The Northern Ireland Public Services Ombudsman (NIPSO) has a unique role in supporting public bodies so together we can learn and drive improvement.

Through our work, we are committed to achieving positive change for people, public services and public policy. We have therefore developed this evidence-informed best practice guidance on learning from complaints.

It is part of a series of guides to support improvement in complaint handling standards across public services, alongside the introduction of a standardised and simplified complaints handling approach.

Complaints help public bodies to learn more about issues from a service user perspective that may be less visible in formal regulatory, audit and inspection processes. Notably, a number of public inquiries highlighted missed opportunities to identify and address systemic issues because of a failure to properly consider and learn from complaints.

One of the main reasons some service users complain about public services is because they do not want others to experience the same failures in service as they have.

A public body is an organisation that provides a public service. This includes government departments and agencies, councils, social housing providers and Health and Social Care Trusts. It also includes organisations commissioned to deliver services on behalf of a public body.

Complaints can help public bodies identify:

- ✓ Early warning signs of where things are going wrong
- ✓ Blind spots in services and service delivery
- ✓ Trends and systemic issues
- ✓ Areas to learn and improve
- ✓ The need for change.

WHO IS THIS GUIDE FOR?

This guide is mainly for senior leaders and middle management staff in public bodies who have responsibility for ensuring that complaints are viewed as an opportunity to learn from and given high priority within the organisation's governance process.

This guide encourages the development of an open learning culture in the delivery of public services and therefore may be a useful resource for senior leaders seeking to bring about change and for those who have a responsibility for complaints and/or governance. It will help staff to understand the importance of welcoming and valuing complaints as learning opportunities to improve service design and delivery.

ABOUT THIS GUIDE

The need for a more open learning culture is the underpinning theme of this guidance, from which everything else stems. Key actions for organisations to demonstrate good practice in learning from complaints are presented within six inter-related areas:

- 1 Embed an open learning culture
- 2 Integrate learning from complaints with other feedback
- 3 Record, analyse and report complaints data
- 4 Implement learning and drive improvement
- 5 Disseminate learning and outcomes
- 6 Evaluate

Good Practice:

A self-assessment matrix to help organisations determine their current learning culture and practice is included in the Appendices.

1. EMBED AN OPEN LEARNING CULTURE

Moving towards a 'just' culture with an emphasis on being open and accountable has many benefits.

It brings a focus on understanding what has gone wrong when mistakes happen and assures people that the organisation is listening to them.

This approach encourages staff to look for opportunities to innovate and continuously improve services.

It may therefore alleviate some of the negative impact that complaints can have on staff well-being and increase their openness to learning.

Key Features:

- ✓ Effective leadership and appropriate governance
- ✓ Values every complaint as an opportunity to learn
- ✓ Promotes complaints as a welcome source of feedback
- ✓ Promotes the benefits of complaints in driving service improvement, empowering staff and increasing public trust
- ✓ Open and accountable when mistakes are made
- ✓ Recognises impact of complaints on staff and supports them
- ✓ Shares lessons learned.

EFFECTIVE LEADERSHIP

Effective leadership underpins a public body's governance framework which is critical to fully embedding an open learning culture. The values and behaviours of senior leaders are fundamental to the culture of an organisation and its ability to learn from complaints.

An open learning culture requires organisations to support staff towards a collectively shared vision and positive change through strong leadership. It can only thrive if senior colleagues are visibly committed to engaging on and learning from feedback and complaints.

Strong leaders understand that while an open learning approach may initially result in more complaints, it does not necessarily mean a deterioration in the quality of service provision. Rather, it is an opportunity to improve.

Leaders who embrace a 'just culture' focus less on process and numbers within their complaints practice and more on demonstrating how they have listened. Some may further promote an open culture by positively seeking and resolving feedback and concerns earlier to try and reduce the number of complaints.

WHAT YOU NEED TO DO

Senior leaders and Board members should have a clearly visible role in and responsibility for the complaints system and how it operates with an organisation. Appropriate governance structures should be in place to ensure senior colleagues are held accountable for using the learning to improve services.

The Chief Executive or a non-executive Board member, should be responsible for:

- ✓ Ensuring the public body, and any contracted providers delivering services on its behalf, have reviewed the model complaints handling procedure.
- ✓ Ensuring that complaints data is reviewed as a regular standing agenda item at Senior Leadership/Board Meetings and via any associated Complaints Panel. *
- ✓ Ensuring there are robust processes in place for:
 - Data recording, analysis and reporting
 - Developing action and improvement plans
 - Monitoring complaints trends, data and learning in relation to contracted providers
 - Sharing learning and improvement (internal/external)
 - Staff training and awareness - every staff member should know how they can support learning from complaints in their own role
 - Evaluation and impact measurement.
- ✓ Monitoring action and improvement plans to ensure they are being or have been effectively implemented.

*** A Complaints Panel is typically composed of senior leaders and staff who are routinely responsible for managing complaints.**

It should meet regularly to:

- Review and analyse complaints data; and identify early warning signs
- Review complaints analysis reports, dashboards and case studies
- Discuss trends in the data, including the absence of complaints in particular areas
- Discuss cases of interest
- Monitor progression of actions to improve services
- Discuss shared learning and dissemination.

- ✓ Set out expectations to embed an open approach to learning from complaints in organisational policy and staff guidance, and make staff aware of it. For example, revise complaints policies to explicitly state organisational commitment to learning through a culture that is open and accountable when things go wrong, and where everyone is supported and empowered to act on learning. All new staff should be made aware of this policy approach and receive an associated induction.

- ✓ Include a section in the organisation's annual report and on the website explaining that the organisation promotes an open learning culture within its complaints procedure, and what this means in practice.
- ✓ Develop strategies and initiatives to learn lessons from the early resolution of stage 1 complaints (in order to reduce the number of stage 2 complaints later). For example, via outreach schemes, service user forums and complaints clinics.
- ✓ Put appropriate measures in place to capture feedback about the complaints process from service users. Options to do this include:
 - Seeking feedback when complaints are closed
 - Online surveys
 - Monitoring feedback posted on social media
 - Qualitative research, such as focus groups.

2. INTEGRATE LEARNING FROM COMPLAINTS WITH OTHER FEEDBACK

Capturing and sharing learning from other sources of feedback alongside complaints data, should be a fundamental component of an open learning system.

It also presents opportunities for innovative approaches in terms of involving service users and providing a vehicle for their voices to be heard.

Although service user feedback is increasingly collected, it is often disconnected from complaints management systems and learning initiatives.

Key challenges for organisations to consider include gathering too much feedback in different forms and being unable to bring the data all together in a meaningful way.

There may also be different approaches within the same organisation to gathering service user feedback, with not all staff aware of it being collected, or using it to inform learning.

Key Benefits:

- ✓ Creates a more complete picture to maximise improvement opportunities
- ✓ Wide range of feedback sources
- ✓ Provides rich insights on specific issues
- ✓ Potential for co-design and service user participation.

WHAT YOU NEED TO DO

- ✓ Develop an integrated approach to learning from service user feedback by triangulating complaints data with other meaningful sources of feedback and information.
- ✓ Consider the most appropriate options from a range of different quantitative and qualitative methods to capture feedback, including via online mechanisms.
- ✓ Provide opportunities for service user participation and promote a co-production approach in the collection of feedback data.
- ✓ The incorporation of other feedback alongside complaints data needs to be balanced with staff capacity and skills to collect, analyse and act on feedback, and to meaningfully include service users.

The next section provides further guidance on recording, analysing and reporting complaints data.

Types of Feedback

There are many different types and combinations of feedback methods that can be utilised alongside formal complaints data, including:

- Questionnaires
- Telephone/web-based surveys
- Interviews and focus groups
- Compliments, thanks and positive feedback
- Social media comments
- User forums/Learning from Experience panels
- Feedback from advocacy groups
- Claims data
- Staff surveys
- Data from staff grievances
- Whistleblowing.

3. RECORD, ANALYSE AND REPORT COMPLAINTS DATA

Access to high quality complaints data is essential for service improvement. An open learning culture with a good governance framework supports organisations to effectively measure the quality of their services through recording, analysing and reporting their complaints data.

The knowledge gained could be a powerful and cost-effective tool in transforming public services. However, challenges include significant variability within and across public bodies in terms of complaint reporting and analysis, and the types of feedback being triangulated with complaints data.

Key Benefits:

- ✓ Promotes continuous learning
- ✓ Provides valuable insights
- ✓ Identifies trends and emerging (systemic) issues, as well as areas of good practice
- ✓ Informs decision-making
- ✓ Supports frontline staff to be more flexible, responsive, and deliver better service quality
- ✓ Learning can be shared for wider strategic impact.

DEMOGRAPHIC INFORMATION

Other challenges include a lack of quality demographic data being collated by public bodies on (i) complainants with protected characteristics; and (ii) the potential barriers to complaining.

As such, complaints data may disproportionately omit learning from complainants who may be more vulnerable to poorer outcomes on the grounds of, for example, their age, gender, disability, sexual orientation and ethnicity.

When key demographic groups are under-represented in complaints data/learning, the extent to which inequalities impact on complaints handling is unclear.

WHAT YOU NEED TO DO

Produce a complaints data strategy:

- ✓ Utilise a centralised, electronic system to record, analyse, and report on learning from complaints and other service user feedback.
 - Spend time planning and thinking about the different types of available data; the purpose of the data being collected; what is being measured; and what analytical methods are most suitable to get the best out of the data.
 - Capture quality complaints data and service user feedback that is relevant, accurate, complete, meaningful and useful.
 - Complement quantitative data with qualitative analysis.
 - Utilise dedicated analytics staff with the capacity and skills to make best use of complaints and other feedback.
- ✓ Quickly identify and address any trends, patterns or wider issues through detailed analysis which considers whether there are recurrent complaints about specific issues, common themes across different complaints, or the absence of complaints in particular areas.
 - Ensure senior leaders have immediate access to complaints performance and trend data through real time reporting systems.
 - Ensure there is a central point of access which enables oversight of all complaints made to contracted providers delivering Services. Use this to track patterns and trends, and examine the detail of complaints that are indicative of poor practice.
 - All contracted providers should be required to submit a monthly return with summary information about each complaint, including the outcome and lessons learned.
- ✓ Better understand the demographic profile of complainants to reduce barriers to raising complaints.
 - Collate a comprehensive range of demographic data from complaints, which includes all protected characteristics.
 - Undertake data analysis to identify gaps in particular sections of the community accessing the complaints process. To support this, consider using complaints outreach programmes, public consultation and satisfaction surveys to engage with advocacy groups.

- ✓ Report on complaints data, analysis and learning activity via internal staff bulletins which are published on (at least) a quarterly basis, to promote innovation, cross-departmental learning, and ongoing awareness about the organisation's positive culture around complaints.
- ✓ Work across the sector to adopt a more consistent and standardised approach towards recording, analysing and reporting complaints data, including the terminology used. This will support comparative analysis, benchmarking and identify common themes for shared learning and improvement. Such work could also include the analysis of demographic data to identify disproportionate impacts and risks to protected groups.
- ✓ **Best Practice Networks** may be a useful mechanism for public bodies to collectively explore which methods and approaches to data capture and analysis are delivering the greatest impact in terms of supporting learning from complaints to drive improvement. They could also consider development of a common data set which supports benchmarking and shared learning across the sector.

4. IMPLEMENT LEARNING AND DRIVE IMPROVEMENT

The implementation of learning from complaints is derived from successful complaints data analysis. The integration of data analysis and learning leads to, and drives, service improvement. These are essential components of a successful complaints handling system and an open learning culture.

While organisations can usually provide some examples of specific improvements made as a result of complaints, it may be more challenging to demonstrate wider learning. One particular challenge for staff is not having designated time to use learning from complaints to improve services.

Appropriate mechanisms to translate learning into action are therefore essential to actually implement the changes needed for improvement. As outlined in Section 1 ('Embed an open learning culture'), this requires a strong governance framework and effective leadership with clearly defined roles and responsibilities, including:

- Ensure there is a robust process in place to produce action and improvement plans when learning has been identified.
- Routinely monitor action and improvement plans to ensure they are being or have been implemented appropriately.
- Share learning to drive improvement, both internally and externally, at a cross-sectoral level.
- Ensure that staff training is a key factor in the implementation of learning from complaints.

Action and Improvement Plan

- ✓ Promotes accountability
- ✓ Defines roles and responsibilities
- ✓ Measurable and timebound
- ✓ Involves complainants and staff
- ✓ Regularly reviewed, demonstrates evidence of a listening and learning culture

WHAT YOU NEED TO DO

When learning is identified, the senior leader with overall accountability should delegate a team member to produce and manage implementation of an associated action and improvement plan, with SMART objectives (Specific, Measurable, Achievable, Relevant and Timely).

- ✓ Ensure staff are informed and utilise learning from complaints to help drive improvement across service areas
 - Develop a communications plan alongside the action and improvement plan, so that everyone involved know what's happening and if/how they will be impacted by the changes.
 - Share learning with staff through newsletters and bulletins on the organisational intranet; and via team meetings; group reflection sessions; staff supervision; training, tutorials and inductions; and online guidance.
 - Provide staff with the relevant tools, time and training to learn from complaints and implement change. Consider developing some training which is co-designed and facilitated with service user forums/former complainants. This could include short videos and e-learning resources.
- ✓ Consider the learning from complaints and how this can be used when commissioning and designing new services.
- ✓ Share learning and insights from complaints through inter-departmental groups, and externally with complaint handler networks/key stakeholders (both locally and nationally) to facilitate best practice and maximise opportunities for improvement.

The Action and Improvement plan should include the following:

- Name of the individual(s) with responsibility for managing and co-ordinating the plan; and for completing each action
- Specific actions to be taken to resolve each issue
- Timescale for implementation
- Evidence needed to show all elements of the plan have been completed
- How and when progress against the plan will be reviewed
- How subsequent improvements from actions taken will be (i) monitored to ensure they are maintained; and (ii) measured for impact
- How any complainant(s) can be involved as the actions are carried out. This might include, e.g., an onsite visit to see changes firsthand; sharing their experiences via publications or the website; assisting with the development of a training plan, or a review of policy and procedures.

Remember: Communicate the plan, actions taken and improvements made to the complainant. This demonstrates organisational willingness to listen to customers, positively act upon and learn from complaints to create lasting and meaningful service improvements.

5. DISSEMINATE LEARNING AND OUTCOMES

The external dissemination of learning from complaints can enhance the reputation of a public body. It demonstrates a commitment to governance, accountability and service improvement.

The wider publication of complaints data by public bodies is also essential for sharing key learning for others to use.

However, this is often overlooked or minimised, when information is not publicly accessible, or fairly minor in nature and lacks detail, actions taken and changes made.

Key Benefits

- ✓ Demonstrates openness and transparency
- ✓ Strengthens public confidence in the organisation and its services
- ✓ Shows that the organisation takes complaints seriously, and is willing to listen, learn and act on mistakes
- ✓ Highlights that complaints are valued and can lead to positive and meaningful change
- ✓ Raises awareness about the organisation's role
- ✓ Increases opportunities for collaboration in developing best practice within complaints handling and service provision.

WHAT YOU NEED TO DO

- ✓ Be proactive about publishing complaints information and do not wait for it to be requested. Develop dissemination strategies to share learning and good practice with complainants, service users, advocacy providers, sectoral colleagues, the media and wider public
 - Use accessible onsite mechanisms in public services to inform people about what changes the organisation has made in response to complaints. For example, via user participation groups, posters, or 'You said, we did' leaflets and display-boards.
 - Include comprehensive information in the organisation's annual report, and/or publish an annual complaints report, about the numbers and types of complaints, how they were dealt with, key themes, the lessons learnt, and improvements made.
 - Include a dedicated and regularly updated complaints outcomes page on the organisation's website, with case studies and summaries of complaints activities. A suggested format for case studies would include background; investigation; outcome and learning; and recommendations/actions.
 - Post regular updates on social media platforms, using case study snapshots and infographics to illustrate complaints data, learning and outcomes.

6. EVALUATE

Evaluation is fundamental for continuous improvement in terms of learning from complaints and other service user feedback.

Regular evaluation can help determine whether the organisation's complaints system is underpinned by an open learning culture, and how successful it is.

It provides vital information for organisations to learn more about their service users, and their experience of services and the complaints process.

Key Benefits

- ✓ Demonstrates impact
- ✓ Highlights good practice, and what is working less well
- ✓ Supports systems and services to become more efficient and effective
- ✓ Informs the organisation's strategic direction and decision-making
- ✓ Provides opportunities for staff and service users to have their voices heard.

WHAT YOU NEED TO DO

- ✓ Develop an evaluation framework in which to:
 - Assess the organisation's complaints culture and practices and to what extent it is an effective learning organisation.
 - Measure the impact of learning from complaints, to understand what works well and why, and to identify any gaps and deficits and how these can be rectified through a process of continuous improvement.
- ✓ Regularly undertake evaluation activities:
 - Examine complaints and service user feedback, statistics, trends and policies; the organisation's governance arrangements; and its approach to recording, analysing, reporting and publishing data.
 - Review the outcomes of individual complaints, including recommendations.
 - Assess how learning has been shared (internally/externally), the changes that have been implemented, and how these changes have been monitored.
 - Conduct surveys/interviews/focus groups with senior leaders, staff, former complainants and service users to find out what they think about the organisation's complaints system and learning culture.
 - Compare complaints data where possible with services of similar size and nature.
- ✓ Utilise a self-assessment matrix as a supporting tool to evaluate the organisation's complaint management system and approach to learning (See Appendices).

APPENDICES



APPENDIX A: ASSESSMENT MATRIX (adapted with permission from PHSO)

PROMOTING A LEARNING CULTURE How all staff in your organisation promote and demonstrate a culture that openly welcomes complaints and is accountable when things go wrong.					
Overall scope of assessment		The assessment should cover: <ul style="list-style-type: none"> • what staff and service users say about the organisation being open to receiving complaints • whether staff feel comfortable about being open and honest when mistakes happen • whether staff believe senior staff take an active role in learning from complaints. 			
	None	Basic	Early progress	Firm progress	Mature
Openness, accountability, freedom to speak up	Staff never speak up if they think things have gone wrong. Staff get no (or limited) training in handling complaints.	Staff say they have basic awareness of the organisation's complaints process and will signpost to it if asked. Staff say they are asked to identify and raise concerns but say this is rarely encouraged or seen in practice. Staff have basic knowledge of freedom to speak up but it is not encouraged or seen in practice.	Staff are trained in complaint handling. Managers get detailed training in encouraging their staff to raise concerns and how to act on them. Senior staff promote openness and transparency with all staff.	Relevant staff receive advanced training in complaint handling and working in an open and accountable organisation. Staff say the organisation welcomes feedback, is open and accountable, and learns when things go wrong. Senior staff are trained to encourage and act on staff concerns and have processes to do this (Following Up). The organisation can give some examples of raising where concerns have been raised and investigated.	All new staff receive detailed training in complaint handling (relevant to their role), speaking up and how the organisation promotes a learning culture. All staff say the organisation has a learning culture. They say senior staff show an openness to learning. Staff regularly identify potential concerns informally and through formal mechanisms. Staff regularly identify and report to senior staff on learning from complaints and are authorised to act on it. This includes feedback from staff about the effect any actions will have on service delivery. Senior staff regularly and visibly encourage all staff to speak up and show how this is used to improve services.

PROMOTING A LEARNING CULTURE (CONTINUED)

	None	Basic	Early progress	Firm progress	Mature
Supporting staff to learn from complaints	Staff say they are not supported to learn from complaints.	Staff Periodically receive general information about complaints learning relevant to them or their service area.	Staff are routinely involved in complaints that affect them or their role. Staff make some learning recommendations to support performance development.	Staff are always engaged in complaints that affect them or their role. Staff are encouraged to reflect on all relevant feedback and what learning they can take from it. This learning is turned into activity.	Staff are proactively engaged in individual and wider learning activities coming from complaints. Learning is fed into personal development activity and wider improvement activities.
Demonstrating a learning culture	Staff have no knowledge or experience of what a learning culture is.	Staff have basic awareness or training in how their organisation acts as a learning organisation at entry-level or induction.	Staff training on how the organisation uses learning from complaints to improve. This training explains how it applies to their role. Staff receive training at entry-level, with refresher training at regular intervals in their career.	There is organisation wide activity on embedding a learning culture in progress, with activities in place to act on learning. Staff have developmental objectives that support them to embed a learning culture approach in their role and in the organisation.	All staff say the organisation is committed to being a learning organisation and can give examples of how it does this. Staff say the organisation has a learning culture in practice at all levels and regularly gives examples of how it has learned. Senior staff show they are committed to operating learning culture through activities in their governance process and leadership style.
Demonstrating a learning culture	Senior leaders have little or no involvement in complaints. Staff say senior staff often have a defensive response to complaints.	Senior staff have limited involvement in complaints, often only getting involved if the issue is high risk.	Senior staff have regular involvement in individual complaints and oversight of qualitative insight arising from complaints.	Senior staff are actively involved in identifying learning from complaints and making sure they act on this	Senior staff are regularly and visibly engaged in complaints. They make sure individual thematic improvement actions based on learning are taken forward and completed. Senior staff routinely see data on feedback to monitor the impact of learning activity. They use this to make sure learning is embedded and addresses the issues raised.

PROMOTING A LEARNING CULTURE (CONTINUED)

	None	Basic	Early progress	Firm progress	Mature
Listening and responding to complaints	<p>Service users have no confidence the organisation welcomes complaints or uses them as an opportunity to improve.</p> <p>Service users say the organisation is defensive or unwilling to learn from complaints.</p>	<p>Service users have limited confidence that the organisation listens and responds to complaints.</p> <p>The organisation captures basic complaints data (number of complaints and action taken).</p>	<p>Service users can see examples of where the organisation has listened and used complaints to learn and improve.</p> <p>Service users feel learning has had some impact on services.</p> <p>The organisation captures and reports some feedback from service users on their experience of the complaints process.</p>	<p>Service users feel the organisation proactively responds to complaints and regularly shows how it has used learning to improve services.</p> <p>The organisation captures detailed feedback from service users and staff about their complaint experience. This is measured and reported to senior staff.</p>	<p>Service users have regular interaction with the organisation about learning activity arising from complaints.</p> <p>Service users have strong assurance the organisation always act on complaints insight to improve.</p> <p>Detailed feedback reporting processes are in place. These include qualitative feedback from service users and staff, often via focus groups or interviews.</p> <p>All results are shared with staff via workshops and published.</p>
Embedding a quality improvement culture	<p>The organisation has no effective oversight of complaints and other forms of feedback.</p> <p>No data on complaints and improvements made, based on feedback, is shared with staff or published.</p>	<p>The organisation provides basic complaints data to senior staff periodically.</p> <p>Some data is shared with staff but is not published.</p> <p>Limited activity is taken on quality improvement tasks based on feedback.</p>	<p>Regular reporting on complaints including learning and insight is given to senior staff, alongside other feedback data.</p> <p>Senior staff use this data to set improvement actions where needed.</p> <p>Reporting is shared with staff and basic data is given annually in a report.</p>	<p>Complaints, legal claims and patient safety data are regularly reported on at senior level, alongside service user experience feedback, via a standing improvement item.</p> <p>This includes reporting on progress against improvement activity based on feedback.</p> <p>The organisation shows how this process leads to quality improvement activity.</p>	<p>Data on feedback, complaints, claims and patient safety insight is delivered as a quality report to senior staff.</p> <p>This is often done by a quality committee (or similar) governance structure.</p> <p>Actions arising from insight or added to the quality improvement programme of activity.</p> <p>Senior staff take individual responsibility for quality improvement activity and report to the board (or equivalent) on progress.</p> <p>Complaints, claims and patient safety teams sit under one quality improvement directorate or division (where appropriate).</p>

WELCOMING COMPLAINTS IN A POSITIVE WAY

How your organisation encourages service users to speak up if things go wrong or do not go as expected. This includes how your organisation shows that it welcomes (and acts on) complaints and how easy it is to make a complaint.

Overall scope of assessment		The assessment should cover:			
		<ul style="list-style-type: none"> whether your organisation is responsive to hearing from them if things have gone wrong or not gone as expected whether they felt their complaint was welcomed, taken seriously and acted on 			
		It should also cover:			
		<ul style="list-style-type: none"> what colleagues say about whether they are encouraged to signpost service users to the complaints process and if they are supported and trained to resolve complaints as quickly as possible. 			
	None	Basic	Early progress	Firm progress	Mature
Advertising the complaints process and welcoming complaints	No visible complaints process.	There is basic signposting to the complaints process, but it is not very visible across the organisation's communication channels.	Signposting to the complaints process is given in all communications (and in all premises). Details of the process are given.	There is visible and easy-to-navigate information on how to complain, with details of the process across all channels, including websites.	Details of how to complain and the complaints process are visible and available in multiple formats.
	Service users say they do not know how to raise a complaint or had to go out of their way to find out.	The language used to advertise the complaints process is confusing or complex.	The language that advertises the complaints process is welcoming and easy to understand.	The organisation regularly reminds service users that it welcomes complaints.	Staff are trained to proactively tell service users about how they can give feedback and help them make a complaint if needed.
	The organisation does not reassure service users that future care will not be affected if they make a complaint.	Service users say they have some awareness of how to complain to the organisation.	Frontline staff are encouraged to remind service users about the complaints process.	Staff have a good knowledge of the complaints process.	Senior staff actively promote the complaints process and welcome feedback from service users.
	Service users say the organisation does not welcome complaints or make it easy to complain.	There is limited service user confidence that their ongoing care will not be affected if they	Service users say they have a good awareness of how to complain and a basic understanding of what will happen if they do.	Service users say they have a very good awareness of how to complain and a good understanding of what will happen if they do.	Service users say they have an excellent awareness of how to complain.
		There is some service user confidence that the organisation welcomes complaints.	There is some user confidence that ongoing service or care will not be affected if they complain.	Service users are confident that the organisation welcomes complaints.	Service users are extremely confident that the organisation positively welcomes complaints, and that their ongoing care will not be affected.

WELCOMING COMPLAINTS IN A POSITIVE WAY (CONTINUED)

	None	Basic	Early progress	Firm progress	Mature
Accessibility	<p>The organisation offers very limited and inflexible routes to making a complaint.</p> <p>The organisation has unclear or complex routes to complaining that are hard for service users to navigate.</p> <p>No details are given on how to get help, advice and support to make a complaint, or for any independent help or advice services that may be available.</p> <p>The organisation does not actively consider requests for reasonable adjustments.</p> <p>Service users say it is very difficult to make a complaint in a way that suits them.</p>	<p>The organisation only accepts complaints through a limited number of channels.</p> <p>The organisation only gives limited or basic information about how to get help, advice and support to make a complaint or about any independent help or advice services.</p> <p>Some service users are happy they could make their complaint easily and in a way that suited them.</p>	<p>The organisation enables service users to make complaints through a range of channels.</p> <p>The organisation gives information on how to get help, advice and support to make a complaint (or on any independent support or advice services) at the beginning of the complaints process.</p> <p>Service users have a good level of satisfaction that they can make a complaint easily and in a way that suits them.</p>	<p>Service users can access a wide range of channels to make complaints based on the most common needs.</p> <p>Online channels for receiving complaints are in place and are easy to use.</p> <p>The organisation makes sure staff have up-to-date information on what help, advice and support (including any independent support or advice services) is available for service users when making a complaint, and regularly signpost service users to it.</p> <p>There are above average levels of service user satisfaction that they can make a complaint easily and in a way that suits them</p>	<p>Staff are always involved throughout the complaint handling process. They help to find a resolution to issues and identify any learning.</p> <p>Staff are always given an opportunity to input into emerging or initial views and final responses.</p> <p>Staff routinely get access to internal resources for help and support during the complaint process, and to reflect on learning or insight.</p> <p>Staff say the organisation fully engages them in complaints and supports them to always be open and reflective.</p>
Timescales	<p>No internal or external timeframes are in place.</p>	<p>Some internal KPIs on handling complaints are given to staff, linked to regulation.</p> <p>The organisation publishes basic KPI's on handling complaints on its website but does not publish data on performance.</p>	<p>The organisation provides detailed KP's on handling complaints on its website, alongside periodic data on performance.</p>	<p>The organisation describes high-level KPIs to each incoming complainant and publishes performance data on its website.</p> <p>Staff are trained to plan and assess on a case-by-case basis how long it will take to look into and investigate issues. They share the estimated time scale with all parties involved.</p>	<p>The organisation provides detailed KPIs for important stages in its complaints process. It captures detailed data on how it is performing.</p> <p>The organisation regularly publishes data on waiting times, performance against KPIs and similar data on its website and through its annual reporting process.</p> <p>Staff always provide tailored time frames on each complaint, considering the complexity of the issues and the work involved. They keep all main parties update on progress throughout the complaint handling process.</p> <p>Staff always let people know if the matter may take longer or can be resolved earlier.</p>

BEING THOROUGH AND FAIR

How your organisation properly trains and resources staff to take a thorough, proportionate and balanced look into complaints. This includes making sure service users who make complaints and staff who are complained about, are meaningfully involved and engaged throughout, that service users know they have been listened to and taken seriously, and that your organisation is committed to giving a fair, open and accountable response.

Overall scope of assessment		The assessment should cover what service users and staff say about how thorough and fair the investigation into the complaint was, and how engaged people felt during the process.			
	None	Basic	Early progress	Firm progress	Mature
Training and support for staff involved in complaint handling	The organisation does not provide complaint handling training.	The organisation provides staff with basic complaint handling training.	Staff are given introductory training in investigative techniques, including resolution skills and effective communication.	Relevant colleagues get comprehensive training in complaint handling and periodic refresher training. There is also training on other procedures for resolving complaints (including regulatory).	Staff have regular access to advanced, developmental training in dispute resolution and mediation skills. The organisation supports specialist complaints colleagues to achieve accredited or certified learning in this area.
	Staff say they are not given any dedicated time to handle complaints.		Staff say they get recognition of the extra time needed to handle complaints.	Staff say they get enough time to handle complaints.	Staff dedicated to complaint handling say they have the proper time and resources to investigate complaints.
Complaint process	The organisation does not have a complaints handling procedure.	The organisation has a basic complaints procedure that outlines the stages and broad requirements.	The organisation has a complaints procedure that clearly defines roles and what is required at each stage.	The organisation has a detailed complaints procedure with guidance and behavioural competencies. It explains what is expected at each stage.	The organisation has a comprehensive complaints procedure, aligned with relevant behaviours. It defines the main user-led outcomes for staff at each stage.
	Complaints are dealt with ad-hoc.	The complaints procedure is available on request.	The complaints procedure is published on the organisation's website.	The procedure clearly aligns with relevant customer charters or values and promises.	Each expected outcome is defined and measurable. It aligns with relevant customer charters or values and promises. The complaints procedure is available in multiple formats and online.

BEING THOROUGH AND FAIR (CONTINUED)

	None	Basic	Early progress	Firm progress	Mature
Meaningful engagement	<p>There is no engagement with the service user who has complained, apart from acknowledgement and occasional updates.</p> <p>Service users who complained and staff complained about say they were not involved in the complaint investigation and where not updated.</p>	<p>Staff engage with the service user to understand their complaint. They give periodic updates on progress.</p> <p>Service users who raise complaints and staff who have been complained about say they were not kept fully updated during the investigation.</p>	<p>Staff take time to listen to service users to understand the issues and plan how they will resolve them.</p> <p>Staff engage meaningfully with the service user who has complained and with colleagues who have been complained about, throughout the entire process.</p> <p>Service users who complained and staff who have been complained about say they were kept updated on progress during the investigation.</p>	<p>Staff agree the scope of the complaint investigation with relevant parties and explain how they will look into the issues.</p> <p>At important points in the investigation, staff share information and give opportunities to relevant parties to comment. Staff are open and transparent and take all comments into account.</p> <p>Service users who complained and staff who have been complained about say they were involved at important points in the investigation.</p>	<p>Staff make sure they have a comprehensive understanding of the complaint issues and create a detailed investigation plan, sharing the main points with the relevant parties.</p> <p>Staff share emerging views on relevant cases as a matter of course. They engaged with all relevant parties to get their input. Staff consider all comments before they give a final response.</p> <p>Service users who complained and staff who have been complained about say that they were meaningfully involved and engaged throughout the investigation.</p>
Strategic oversight and multi-service area or organisational complaints	<p>The organisation has no engagement between its service areas and with other associated organisations when dealing with complaints.</p> <p>The organisation fails to communicate or collaborate with its associated organisations (where this is relevant) to make sure they're handling complaints consistently.</p>	<p>There is some contact between service areas and with other associated organisations, but individual complaint responses have limited reference to other service areas or associated organisations.</p> <p>The organisation provides basic guidance and expectations to associated organisations (where this is relevant) to make them aware of what is expected when dealing with complaints.</p>	<p>The organisation collaborates with others linked to the complaint issues to coordinate a response to the complaint.</p> <p>The organisation has periodic meetings with associated organisations to review their complaints procedure and insight or learning from complaints they have received.</p>	<p>The organisation identifies and engages meaningfully with all service areas involved in a complaint and with other relevant organisations. Together, they decide the best approach to the investigation.</p> <p>The organisations involved agree who will take the lead in giving a response and agree how to best answer issues raised.</p> <p>Investigation plans include activity in each service area and associated organisation to make sure they investigate all the complaint issues.</p> <p>The organisation has regular meetings with associated organisations to work and act on learning arising from complaints and service users experience.</p>	<p>The organisation proactively engages with all relevant service areas and other organisations to agree who will lead in giving a single or coordinated response to the complaint whenever possible.</p> <p>The organisation agrees a co-ordinated plan and approach to multi-service area or organisational investigations and engages all the relevant parties in this.</p> <p>When acting as lead organisation, it engages with all other organisations to give a single response that includes the outcome or findings from all others, whenever possible.</p> <p>The organisation has a collaborative and meaningful relationship with all associated organisations (where this applies). It makes sure they are fully involved and engaged in handling complaints, learning from insight and taking action to improve. The organisation captures this in its reporting on complaints.</p>

GIVING FAIR AND ACCOUNTABLE RESPONSES

How your organisation makes sure staff give a fair, open unbalanced response to complaints, and takes accountability when things have gone wrong or services have had an unfair impact. This includes putting things right for individuals and supporting staff to use complaints to develop and continuously improve services.

Overall scope of assessment		Assessment should cover what service users and staff say about the quality of complaint responses and whether they reflect an open under countable approach to when things have not gone as they should have. This includes how your organisation acts to put things right and uses learning from complaints to support and develop staff. The assessment must cover how your organisation uses learning to make system wide improvements to its service..			
	None	Basic	Early progress	Firm progress	Mature
Quality of complaint responses	Responses lack detail or depth.	Responses give a basic explanation of what happened.	Response set out what happened and what should have happened.	Responses give a clear, balanced and empathetic account of what happened and what should have happened, based on relevant evidence.	All responses are clear and objectively based on evidence. They refer to relevant laws, standards, policies, procedures and guidance. Responses show empathy and use human factors analysis wherever needed.
	Responses fail to take individual views into account.	Responses refer to accounts from the service user who raised the complaint and others.	Responses broadly considered evidence or information given by service users raising complaints and staff who have been complained about.	Responses specifically refer to evidence provided by the service user raising the complaint and staff who have been complained about. They clearly set out how the organisation has used that evidence to reach a decision.	Responses objectively describe accounts of what happened from the service user raising the complaint and staff who have been complained about.
	Service users say the response to their complaint did not properly address the issues and their views were not considered.	Overall, service users are satisfied that their response covered the issues.	Staff sometimes share initial views on a complaint to get comments before issuing a final response.	Staff share initial views on complex complaints, using face-to-face meetings where appropriate, and take any comments received into account in their final response.	They clearly show how the organisation has considered these accounts in reaching a decision.
			Staff sometimes use face-to-face meetings to discuss initial views and responses.	There is a good level of service user and staff satisfaction that the response was thorough, objective and fair. People say they felt involved in the process.	Staff regularly share initial views on most complaints, using face-to-face meetings where needed.
			Service users and staff say they felt the response covered the issues and took their views into account.		Final responses always include comments from all parties involved. They show how the organisation has considered these comments before reaching a final view.
					Service users and staff are highly satisfied that the responses were objective fair and thorough. All parties agree they were fully engaged in the process.

GIVING FAIR AND ACCOUNTABLE RESPONSES (CONTINUED)

	None	Basic	Early progress	Firm progress	Mature
Openness and accountability	<p>Responses are defensive and give inadequate explanations or remedy.</p> <p>The organisation fails to take any accountability for any failings, errors or impact.</p>	<p>Responses give broad acknowledgement and things have gone wrong.</p> <p>Responses show that the organisation takes some accountability.</p>	<p>Responses give detailed acknowledgement of where things went wrong and include some consideration of the impact this had.</p> <p>Responses show that the organisation takes overall accountability for what happens if things go wrong.</p>	<p>Responses give an open, detailed assessment of where things have gone wrong and the impact this has caused. They give a detailed account of the impact on the individuals concerned.</p> <p>Responses show that the organisation takes clear accountability for what happened and recognises the impact this may have had.</p>	<p>Responses actively show transparency and openness. They take full accountability when things have gone wrong.</p> <p>Responses also acknowledge any unintended impact of services, even when the service was provided correctly.</p> <p>Responses give first-hand accounts of impact on the service user, staff and any other relevant parties.</p>
Quality of remedy	<p>Responses are defensive. They only give a general acknowledgement or apology if something has gone wrong and caused a negative impact.</p> <p>No other remedies are offered or given.</p>	<p>When something has gone wrong, responses give a meaningful apology about specific issues when necessary.</p> <p>Service users who have complained have limited satisfaction that the organisation gave a meaningful apology and appropriate remedy.</p>	<p>Staff are supported to look at how best to put things right in each individual case, if a negative impact is identified. They do this using a range of options for remedy.</p> <p>Apologies given are always specific, meaningful and sincere, and fully address the identified impact.</p> <p>Service users are satisfied that the organisation give an appropriate remedy.</p>	<p>Staff proactively identify and implement ways to put things right in each individual case, with a view to resolving cases as quickly as possible.</p> <p>Meaningful apologies are given in a variety of ways (in writing and in person) that often include individual staff. The organisation makes sure staff provide financial remedies where appropriate.</p> <p>Service users are very satisfied that the organisation gave them an appropriate remedy.</p> <p>The organisation monitors remedy activity across all its service areas. It makes sure this is consistent and fully addresses the issues.</p>	<p>Staff have the confidence to put things right using a wide range of remedy options with emphasis on resolving cases as a default.</p> <p>Staff who have been complained about are routinely involved in providing meaningful apologies and remedies. They are confident and happy to do that in person where necessary.</p> <p>Remedies include systemic improvement activities that clearly link to the learning arising from the complaint issues.</p> <p>There is very high satisfaction among service users that the organisation has given an appropriate remedy.</p> <p>The organisation makes sure oversight of remedy activity is held at senior staff or governance level. It continuously reviews whether remedy actions are appropriate and proportionate to the issues in hand.</p> <p>The organisation reports on remedy activity and publication of its complaints data.</p> <p>If a systemic remedy approach is needed, the organisation puts a proportionate, fair and comprehensive process in place so service users can apply for (and receive) fair and efficient remedy to address the systemic issue in question.</p>

GIVING FAIR AND ACCOUNTABLE RESPONSES (CONTINUED)

	None	Basic	Early progress	Firm progress	Mature
Acting on learning	<p>Learning is never identified.</p> <p>Service users are not satisfied the organisation has identified and acted on learning arising from their complaint.</p>	<p>General learning points are noted in responses and some activity is taken forward.</p> <p>Some service users are satisfied that the organisation has acted on learning arising from their complaint.</p>	<p>Suitable learning points are identified and details of how they will be taken forward are recorded and shared in responses.</p> <p>Overall, service users are satisfied the organisation has acted on learning arising from their complaint.</p>	<p>Individual learning points for both the organisation and staff are identified and recorded. Details of how they will be active on are given in the response.</p> <p>Action plans are drawn up internally to monitor completion of any actions.</p> <p>Service users have a good level of satisfaction that the organisation has acted on learning arising from their complaint. The organisation carries out some thematic analysis of learning to identify any systemic improvements.</p>	<p>In its response, the organisation gives details of all learning points and what action it will take at multiple levels. This includes what aims to achieve and how it will measure this.</p> <p>Developmental learning activity that has been identified for staff is put in place and monitored. Action plans give details of milestones for completion will.</p> <p>The organisation keeps the service user involved and informed of progress on learning arising from their complaint, where possible.</p> <p>The organisation regularly outlines (internally and externally) what learning it has taken from complaints and how it is putting it into practice.</p> <p>The organisation regularly carries out thematic analysis of all learning points to proactively identify and action systemic improvements.</p> <p>The organisation regularly shares learning outside the organisation to help promote continuous improvement.</p> <p>The organisation combines learning from other routes (such as patient safety) to carry out a comprehensive review of systemic learning.</p>

APPENDIX B:
PLANNING FORM FOR CAPTURING RESULTS OF SELF-ASSESSMENT AGAINST MATURITY MATRIX

Complaint Standards organisational assessment

To: _____

Completed by: _____

Date: _____

Proposed date of next assessment: _____



PROMOTING A LEARNING CULTURE				
Scope of assessment	Rating	Evidence to support rating	Development activity	Training and resource needs
Openness, accountability, freedom to speak up				
Supporting staff to learn from complaints				
Demonstrating a learning culture				
Visibility of senior staff				
Listening and responding to complaints				
Embedding a quality improvement culture				

WELCOMING COMPLAINTS IN A POSITIVE WAY

Scope of assessment	Rating	Evidence to support rating	Development activity	Training and resource needs
Advertising the complaints process and welcoming complaints				
Accessibility				
Supporting staff complained about				
Timescales				

BEING THOROUGH AND FAIR				
Scope of assessment	Rating	Evidence to support rating	Development activity	Training and resource needs
Training and support for staff involved in complaint handling				
Complaint process				
Meaningful engagement				
Strategic oversight and multi-service area or organisational complaints				

GIVING FAIR AND ACCOUNTABLE RESPONSES

Scope of assessment	Rating	Evidence to support rating	Development activity	Training and resource needs
Quality of complaint responses				
Openness and accountability				
Quality of remedy				
Acting on learning				



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