

# Complaints Handling Procedures (CHP)

## Governance

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## Roles and responsibilities

1. All staff will be aware of:
  - the Complaints Handling Procedure (CHP);
  - how to handle and record complaints at the frontline response stage;
  - who they can refer a complaint to, in case they are not able to handle the matter;
  - the need to try and resolve complaints early and as close to the point of service delivery as possible; and,
  - their clear authority to attempt to resolve any complaints they may be called upon to deal with.
2. Training on this procedure will be part of the induction process for all new staff. Refresher training will be provided for current staff on a regular basis.
3. Senior management will ensure that:
  - Heriot-Watt University's final position on a complaint investigation is signed off by an appropriate manager or officer in order to provide assurance that this is the definitive response of the University and that the complainant's concerns have been taken seriously;
  - it maintains overall responsibility and accountability for the management and governance of complaints handling (including complaints about contracted services);
  - it has an active role in, and understanding of, the CHP (although not necessarily involved in the decision-making process of complaint handling);
  - mechanisms are in place to ensure a consistent approach to the way complaints handling information is managed, monitored, reviewed and reported at all levels in University; and,
  - complaints information is used to improve services, and this is evident from regular publications.
4. **Principal:** The Principal provides leadership and direction in ways that guide and enable us to perform effectively across all services. The Principal may take a personal interest in all or some complaints, but will normally delegate responsibility for the CHP to the University Complaints Office. Regular management reports assure the Principal, the University Executive, the Global Operations Executive, and the University Court of the quality of complaints process and procedures.
5. **Secretary to the Court and University Secretary** is responsible for ensuring that there are governance and accountability arrangements in place in relation to complaints about contractors. This includes:
  - ensuring performance monitoring for complaints is a feature of the service/management agreements between Heriot-Watt University and contractors
  - setting clear objectives in relation to this complaints procedure and putting appropriate monitoring systems in place to provide Heriot-Watt University with an overview of how the contractor is meeting its objectives
6. **Secretary to the Court and University Secretary** is also responsible for ensuring that there is an effective Complaints Handling Procedure, with a robust investigation process that

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demonstrates how we learn from the complaints we receive. The Secretary to the Court and University Secretary may take a personal interest in all or some complaints, but will normally delegate responsibility for the CHP to the University Complaints Office.

7. **Heads of Primary Academic Units (School) and Directors of Professional Services** may be involved, or may delegate responsibility, in supporting the investigation and management of complaints handling. As senior officers they may be responsible for preparing reports to the University Complaints Office, in order for the University Complaints Office to respond to the complainant(s). Therefore, they should be satisfied that their investigation, or that on behalf of their School or Professional Service, is complete and the response addresses all aspects of the complaint. These senior officers will also be responsible for addressing any lessons learned or action points resulting from a complaint in their applicable areas.
8. **Head of Policy and Governance** is responsible and accountable for the management of the effective Complaints Handling Procedure, with a robust investigation process that demonstrates how we learn from the complaints we receive. The Head of Policy and Governance may be involved in supporting, or take responsible for, the investigation and management of certain complaints.
9. **Complaints Officers and Investigators** are responsible for the management of the investigation. They will work as part of a centralised team, and will be involved in the investigation and in coordinating all aspects of the response to the complainant. This may include preparing a comprehensive written report, including details of any procedural changes in service delivery and identifying wider opportunities for learning across the University.
10. **The Senior Complaints Officer** will act as the University's SPSO Liaison Officer, who are responsible for providing complaints information in an orderly, structured way within requested timescales, providing comments on factual accuracy on our behalf in response to SPSO reports, and confirming and verifying that recommendations have been implemented.
11. **Heads of Operations and Registry and Academic Support Liaison Officers** within each Primary Academic Unit (School) will act as a complaints contact for that School and provide support, from a School perspective, on ensuring that complaints are reported within the agreed timeframes.
12. **The Professional and Organisational Development (POD)** team within the Human Resource Directorate, in conjunction with the Head of Policy and Governance Division is responsible for ensuring all new staff receive training on the CHP as part of the induction process, and that refresher training is provided for current staff on a regular basis.

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## Recording, reporting, learning from and publicising complaints

13. Complaints provide valuable feedback. One of the aims of the CHP is to identify opportunities to improve services across Heriot-Watt University. By recording and analysing complaints data, we can identify and address the causes of complaints and, where appropriate, identify training opportunities and introduce service improvements.
14. We also have arrangements in place to ensure complaints about contractors are recorded, reported on and publicised in line with this CHP.

### Recording complaints

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15. It is important to record suitable data to enable us to fully investigate and respond to the complaint, as well as using our complaint information to track themes and trends. As a minimum, we should record:
  - the complainant's name and contact details
  - the date the complaint was received
  - the nature of the complaint
  - the service the complaint refers to
  - staff member responsible for handling the complaint
  - action taken and outcome at frontline response stage
  - date the complaint was closed at the frontline response stage
  - date the investigation stage was initiated (if applicable)
  - action taken and outcome at investigation stage (if applicable)
  - date the complaint was closed at the investigation stage (if applicable); and
  - the underlying cause of the complaint and any remedial action taken.
  - the outcome of the SPSO's investigation (where applicable).
16. If the complainant does not want to provide any of this information, we will reassure them that it will be managed appropriately, and record what we can.
17. Individual complaint files will be stored in line with our document retention policy.

### Learning from complaints

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18. We have clear systems in place to act on issues identified in complaints. As a minimum, we will:
  - seek to identify the root cause of complaints;
  - take action to reduce the risk of recurrence; and,
  - systematically review complaints performance reports to improve service delivery.
19. Learning may be identified from individual complaints (regardless of whether the complaint is upheld or not) and from analysis of complaints data.

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20. Where we have identified the need for service improvement in response to an individual complaint, we will take appropriate action. University Complaints Office will inform the applicable Head of Primary Academic Unit (School) or Director of Professional Services of the details of the complaint and the lessons learned, who will be responsible for:

- determining the proposed action needed to improve services;
- designating the 'owner' of the issue, who will be responsible for:
  - ensuring the action is taken;
  - setting a target date for the action(s) to be taken;
  - reporting back to, and updating, the University Complaints Office; and,
  - ensuring that the action(s) is taken within the agreed timescale;
- ensuring that the issue has been resolved;
- ensuring the performance in the service area is monitored to avoid any similar complaint(s); and,
- determining where appropriate, any learning points that should be shared with relevant staff.

21. SPSO has guidance on **Learning from complaints**.

22. Senior management will review the information reported on complaints regularly to ensure that any trends or wider issues which may not be obvious from individual complaints are quickly identified and addressed. Where we identify the need for service improvement, we will take appropriate action (as set out above). Where appropriate, performance in the service area should be monitored to ensure that the issue has been resolved.

## Reporting of complaints

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23. We have a process for the internal reporting of complaints information, including analysis of complaints trends. Regularly reporting the analysis of complaints information helps to inform management of where services need to improve.

24. We will report at least **quarterly** to the Global Operations Executive and at least annually to the University Court on:

- performance statistics, in line with the complaints performance indicators published by SPSO; and,
- analysis of the trends and outcomes of complaints (this should include highlighting where there are areas where few or no complaints are received, which may indicate either good practice or that there are barriers to complaining in that area).

## Publicising complaints information

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25. We publish on a **quarterly** basis information on complaints outcomes and actions taken to improve services, to the Global University Executive and at least annually to the University Court.

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26. This demonstrates the improvements resulting from complaints and shows that complaints can help to improve our services. It also helps ensure transparency in our complaints handling service and will help to show that we value complaints.
27. We will publish an **annual** complaints performance report on our website in line with SPSO requirements, and provide this to the SPSO on request. This summarises and builds on the quarterly reports we have produced about our services. It includes:
- performance statistics, in line with the complaints performance indicators published by the SPSO; and
  - complaint trends and the actions that have been or will be taken to improve services as a result.
28. These reports must be easily accessible to members of the public and available in alternative formats upon request.