

# SCRA Complaints Handling Procedure

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## Introduction and Background

SCRA last issued a Complaints Handling Procedure (CHP) in 2003.

Apart from the need to continually revise and improve our procedures, there is now a legal reason why our CHP requires to be updated.

The Scottish Public Services Ombudsman, through powers created by The Public Services Reform (Scotland) Act 2010, has created a Statement of Complaints Handling Principles, and a model CHP for use by public services.

This was designed to simplify and streamline CHP's for public bodies. It focuses on early resolution of complaints, with staff being properly trained and empowered to deal with complaints.

SCRA has adopted these principles in this new CHP.

As well as making our CHP simpler, we have also made it more accessible to our service users. A new paper leaflet has been created, with an electronic version available on our website. We have also made it easier for children and young people to make a complaint with a dedicated electronic complaints form for children and a separate one for young people.

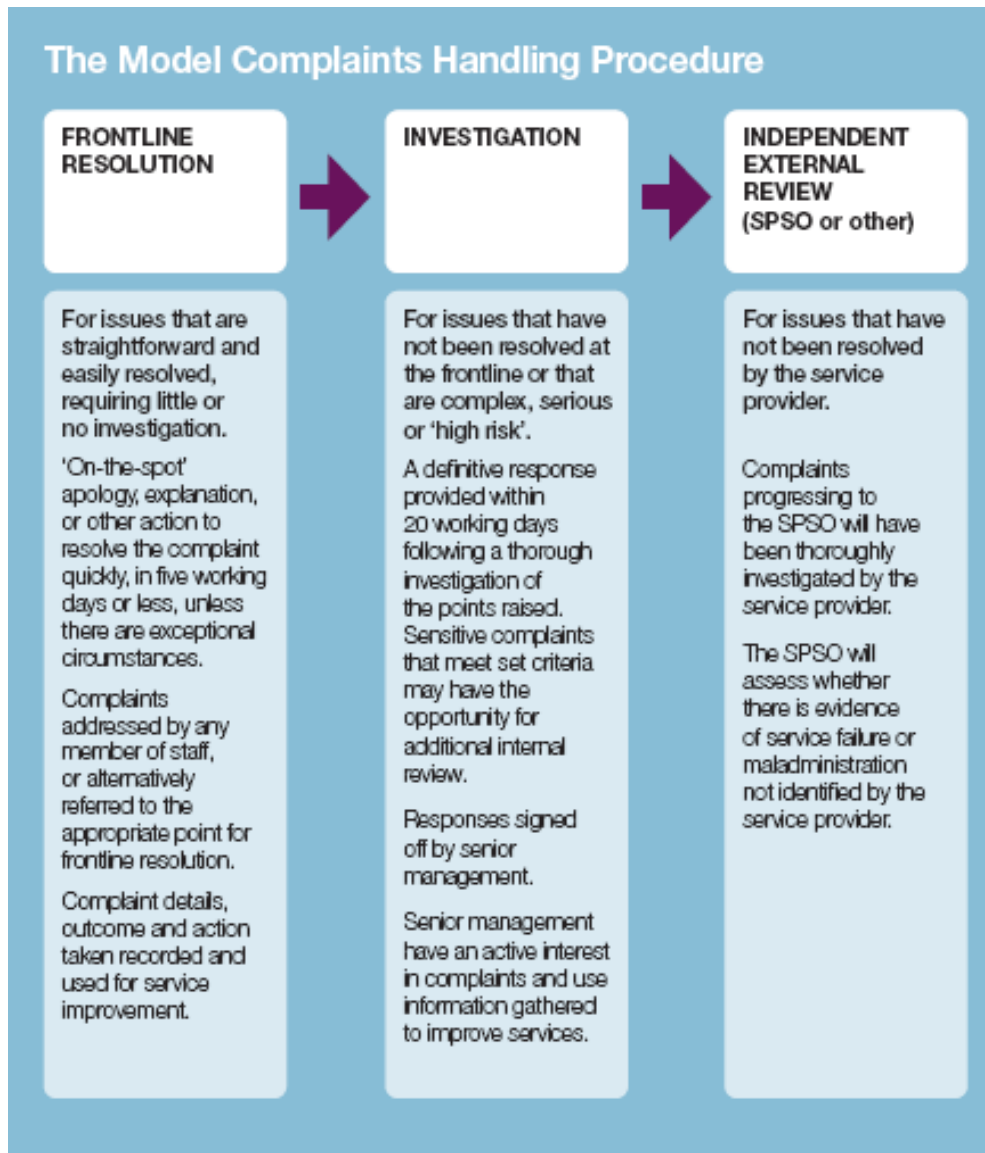
We are developing a culture of valuing complaints, recognising that complaints are an excellent way of learning and driving improvements. Individual lessons are learned through each complaint that we receive, and the organisation will collectively learn about more general issues.

We will constantly review our CHP and update it when necessary. Your feedback on this new CHP is welcomed. Please let us know if there are any difficulties in using this CHP, or if there are any ideas for improving it. You can contact us at [communications@scra.gsi.gov.uk](mailto:communications@scra.gsi.gov.uk).

Acknowledgments: Thank you to the Scottish Public Services Ombudsman and its staff for their support and guidance.

## Section 1: Process and Accountability

1. The following graphic outlines the model CHP created by the SPSO - SCRA's guidance reflects this model.



### Frontline resolution

2. We will take every opportunity to resolve complaints at the first point of contact, if at all possible. Frontline resolution will be attempted where the issues involved are straightforward and potentially easily resolved, requiring little or no investigation.

3. Complaints may be received by different means such as a letter or email, over the telephone or in person. Accordingly, all staff members who could potentially be the first point of contact for a service user wishing to raise a complaint, will be equipped to attempt to resolve a complaint relevant to their area of service there and then, wherever possible.

In a practical sense, this means all frontline staff will, as a minimum, be aware of SCRA's CHP and be empowered to deal with and resolve such complaints as they arise. Alternatively, in the event that they are unable to deal with the complaint, for example if they are unfamiliar with the issues or area of service involved, they will be in a position to signpost service users and/or complaints received to the appropriate point for frontline resolution.

4. The clear focus of frontline resolution is on taking action to resolve complaints quickly where this is possible. This may take the form of a quick apology or explanation for a service failure where this is evident.

5. Complaints resolved at the frontline of service provision are an effective tool in terms of minimising costs as well as resolving customer dissatisfaction. The fewer people that are involved in responding to a complaint, and the quicker a response is given, the greater the chance of resolution and the lower the cost of that complaint to SCRA in terms of resources and potential redress.

#### When is frontline resolution appropriate?

6. As a matter of course, any staff member being presented with a complaint (regardless of whether that complaint has been submitted in writing, in person or by telephone) will attempt to resolve the issue that has been raised. The following are examples of issues that are suitable for frontline resolution:

#### Examples of issues suitable for frontline resolution:

- A service that should have been provided by SCRA has not been provided.
- A service has not been provided by SCRA to an appropriate standard.
- A request for a service has not been answered/actioned.
- A complaint that an SCRA staff member was rude or unhelpful.
- An SCRA staff member failed to attend a scheduled appointment.

7. The member of staff receiving the complaint should consider four key questions:

- What is the complaint?
- What does the service user wish to achieve by complaining?



- Can I achieve this, or provide an explanation as to why not?
- If I can't resolve this who can I refer the complaint to for frontline resolution?

**8.** Wherever possible, staff members who are the subject of a complaint will not handle or respond to the complaint. Neither will frontline staff who may have a clear conflict of interest in the matter. These complaints can still be resolved at the frontline, however, through involving other staff as appropriate including supervisory staff.

**9.** It is the nature of the complaint (i.e. non-complex/non-contentious), rather than the means by which it is presented, that should determine whether a complaint is handled at the frontline. A complaint in writing could, therefore, be resolved at the frontline.

Where a complaint has been successfully resolved at the frontline, and the outcome has been communicated to the complainant either by face-to-face, telephone or email communication, there is no additional requirement to send further written confirmation to the service user, although we may choose to do so if deemed appropriate.

**10.** There may be occasions where a complainant simply refuses to engage with attempts to achieve frontline resolution and insists that their complaint be fully investigated and a formal response provided. Although every effort will be made to resolve complaints at the frontline, in these circumstances complaints should be escalated and investigated.

### Who responds to complaints at the frontline?

**11.** Any frontline member of staff can potentially be approached by a service user wishing to raise a complaint. All frontline staff involved in delivering services will, therefore, seek to resolve straightforward complaints at the point of service delivery where they are qualified and in a position to do so.

**12.** Of course, it will not always be possible for all frontline staff to attempt to resolve complaints about all issues. Frontline staff will pass the complaint to an appropriate and empowered member of staff, if they themselves are not in a position to handle the complaint directly.

### Identifying complaints

**13.** A crucial part of the work of frontline resolution is to identify that a complaint is being made.

The following is a definition of a complaint:

*A complaint is an expression of dissatisfaction by one or more members of the public or from another agency about SCRA's action or lack of action, or about the standard of service provided by, or on behalf of, SCRA.*



**14.** Many complaints that SCRA receives do not actually relate to our service. The most common example is a complaint about the conduct of a Panel Member or about the decision made by a Children's Hearing. In these circumstances staff will direct the service user to our leaflet or our website. Staff will try to be as helpful as possible, if necessary offering to pass on a complaint to the correct service (e.g. the Panel Chair), or advising the service user to seek legal advice.

### **Timescales for frontline resolution**

**15.** The aim of frontline resolution is to provide a quick, informed response to a complaint without the need for a detailed investigation of the points raised. The issues are by definition those that can mostly be addressed 'on-the-spot' by frontline staff. In this context it is likely that resolution will take place face-to-face or on the telephone, and should be achievable within a short period of time - 24 hours in the majority of cases.

**16.** Frontline resolution will be completed within five working days. In practice frontline resolution will often be achieved in a much shorter timescale.

**17.** It may on occasion be necessary to obtain information from other parts of the organisation to resolve the complaint at the frontline. Where this is the case, frontline staff will make the appropriate enquiries to obtain the information required for the response to be made to the complainant.

It is important, however, that frontline staff take no longer than five working days to go back to the service user, either with a response that resolves the matter, or to advise the service user that their complaint is going to be investigated further.

**18.** In exceptional circumstances, where there are clear and justifiable reasons for doing so, we have the option to negotiate an agreed extension with the complainant during frontline resolution. This extension will be of no more than five working days and will be applied only when this will increase the possibility of resolving the complaint at the frontline without escalation to investigation.

Where this action is taken, authorisation will be obtained from the line manager of the person dealing with the complaint. It is important to stress that such extensions will not become the norm and should only be used in a small proportion of complaints.

**19.** Where the timescale is extended during frontline resolution, the reasons for delay and a revised timescale for response will be provided to the complainant. Importantly, all attempts to resolve the complaint will take no longer than 10 working days from the date of receipt of the complaint.



## Recording, learning and accountability

**20.** Senior management will take an active interest in the volume and nature of all complaints received. Line managers will take responsibility for frontline complaints handling within their area of authority and record and report performance to senior management on a regular basis. Managers will ensure that learning from complaints is sent to relevant staff.

### Frontline resolution – key points:

- All frontline staff are responsible for dealing with complaints.
- Frontline staff will make themselves aware of the CHP, and regard themselves as empowered to resolve complaints wherever possible or to escalate the complaint to a higher level.
- An immediate response is preferred or within five working days if informal investigation is required.
- Telephone or face-to-face contact is encouraged.

## When is investigation appropriate?

**21.** Some examples of complaints that may be considered suitable for investigation are listed below, but any member of staff dealing with a frontline complaint is free to seek guidance with a view to escalating the complaint.

### Examples of issues suitable for investigation:

- Frontline resolution was attempted, but the service user remains dissatisfied.
- The service user refuses to engage with the frontline resolution process.
- The issues raised are complex and will require detailed investigation.
- The complaint relates to issues that have been identified as serious or high risk/high profile.

### Issues which may lead to potential serious or high risk profile complaints:

- Involves death or terminal illness.
- Involves major delays in service provision or repeated failure to provide a service.
- There has been press interest.
- A risk to the organisation has been identified.



## Investigation

**22.** Not all complaints are suitable for frontline resolution and not all complaints will be satisfactorily resolved by the frontline. Complaints handled by investigation are typically those that are complex or require a certain amount of examination to establish the relevant facts before we can state our position.

**23.** At the investigation stage, the investigating officer should also be aiming to 'get it right first time'. Their goal is to establish all of the facts relevant to the points raised and provide a full, objective and proportionate response that represents our definitive position. Decisions reached at this stage of the CHP should communicate the views of Senior Management.

### Who responds to complaints that require investigation?

**24.** Dependant upon the issues raised within a complaint and if it is decided that investigation is required, then a referral will be made to Senior Management who will appoint an investigating officer.

**25.** Complainants will have a single point of contact for their complaint. Not only does this provide reassurance for them that someone is attending to their complaint, it also ensures that one individual within SCRA has taken responsibility for investigating the points raised and responding to them. The complainant will be provided with the name and contact details of the person dealing with their complaint as early as possible after the decision to investigate the matter is taken.

**26.** The investigating officer is responsible for establishing what information is required, for gathering that information and for ensuring that the information gathered is of a suitable quality and accuracy to enable a full and informed response to be issued.

**27.** The investigating officer will be a staff member that has not been involved in the issues complained about nor, where possible, have had previous contact with the complainant. If appropriate, the investigating officer will be from a different area.

**28.** Staff selected as investigating officers, will have sufficient internal credibility and independence to ask difficult questions, and recommend changes to policy or procedures in response to the complaint. They will have a thorough understanding of the CHP and a reasonable knowledge of the procedures of the department or function involved. They will be fully trained in how to plan and conduct investigations, including how to obtain and analyse evidence. They will have the authority to resolve complaints within pre-determined boundaries and will have the support of Senior Management to do so. There will be a direct reporting line to the Senior Management team and investigators will also be able to seek advice from Senior Management about the conduct or findings of an investigation whenever necessary.



## Support for staff through the investigation process

**29.** Where staff members become directly or indirectly the subject of investigation, it is not only important that they are made aware of the relevant allegations or concerns as early as practical by the investigating officer, but also that they are provided with appropriate support throughout the process. To that end SCRA will appoint a separate member of staff with sufficient knowledge and experience to provide support and advice. That support person will make contact with the staff member offering their services and will make themselves available as appropriate. It is important that the support person is kept informed of progress by the investigating officer. This provision of support is in addition to other supports available to staff such as their local UNISON representative and the ICAS help line.

**30.** This offer of support is independent of SCRA's Disciplinary Policy in which employees are entitled to representation – and which has a different purpose. The Disciplinary Policy should be strictly followed in cases where the investigation demonstrates that the issues are within the scope of that policy.

## Timescales for investigation

**31.** The following deadlines will be appropriate:

- Complaints will be acknowledged within three working days.
- A full response will be provided within 20 working days.

**32.** If the response is likely to be delayed, the complainant will be told and given a revised timescale for bringing the investigation to a conclusion.

**33.** It is recognised that some complex complaints may take longer to resolve and that there may be some complaints that are so complex that they will require careful consideration and detailed investigation beyond the 20 working days target. Where there are clear and justifiable reasons for extending the timescale, the investigating officer will set time limits on any extended investigation, subject to agreement with the complainant. The important consideration in cases which exceed the 20 working days target is that the complainant should be kept updated of the reason for the delay and given a revised timescale for bringing the investigation to a conclusion.

**34.** There may be occasions where we have no option but to 'suspend' a complaint investigation in circumstances where the case cannot be closed but, for reasons outwith our control, it cannot be progressed either. Examples of such situations may include cases where we cannot get the information we require as a result of incapacity/health issues or in cases where a person cannot be contacted.

Suspending a complaint will be very much the exception, with any decision to suspend an investigation being agreed by Senior Management. A decision to



suspend will be formally recorded and be for a defined period of time at the end of which it should be reviewed.

#### **Additional internal review**

**35.** A key driver of this CHP is to reduce the complexity of existing complaints processes by having as few steps as necessary within an agreed and transparent timeframe. The adoption of a streamlined process, with no additional stages of review, will help to focus us on moving towards a culture of getting it right the first time, and will reduce the cost implications of progressing complaints through additional tiers of a complaints process.

#### **Accountability**

**36.** It is recognised that Senior Management have a vested interest in any complaints about the service that we provide, and any procedural changes or financial losses resulting from those complaints. Senior Management will be made aware of all complaints considered that are investigated under the CHP and will ensure they are involved in matters that require their individual attention. The reporting system to be introduced will provide regular information on all complaints.

**37.** Our final position on any complaint which requires the appointment of an investigating officer will be communicated by Senior Management to the complainant.

#### **Investigation – key points:**

- Senior Management will define the issues to be considered when a formal investigation is instructed.
- We will provide a full written response within 20 working days.
- The outcome of any formal investigation will be a single definitive decision, signed by Senior Management.
- Senior Management will take ownership of decisions reached.



## Section 2: Tools for Investigation and Redress

### Establishing the complaint

**38.** Where possible, complaints to be considered that require further investigation should be submitted in writing. It is important, however, that this does not present a barrier to the complainant and that they do not feel that it is being used as such. Where the service user cannot provide the complaint in writing, SCRA will accept complaints also by e-mail and verbally.

If SCRA staff assist the complainant by writing the complaint for them, the member of staff will read the complaint back to the service user to ensure that an accurate record has been taken. Where possible, the complainant should endorse the complaint form or letter to show that they agree that this is the complaint they want to make.

**39.** There will be occasions where a service user is unable, or reluctant, to make a complaint on their own. SCRA will accept complaints brought by third parties as long as they obtain appropriate consent from the child or family or professional. They will also explain the role of advocacy agencies e.g. Family Law Centres and their ability to provide impartial assistance to complainants. Complaints which do not centre on specific cases, but are related to policy and procedure in general, may be made anonymously (e.g. by non-identifying email).

**40.** On receiving a complaint, the investigating officer will address three key questions:

- i** What is the complaint?
- ii** What does the complainant wish to achieve by complaining?
- iii** Are the complainant's expectations realistic and achievable?

**41.** The answers to these questions should be established and agreed by the SCRA staff member and complainant at the outset. In many cases the answers will be clear, but where they are not, the SCRA staff member will ask the service user directly for clarification. Once the specific points of complaint and the desired outcome are established, the investigating officer can use these to focus the investigation. A proper investigation starts with a thorough review of the circumstances being complained about.

### Investigating complaints

**42.** To establish the facts behind the complaint and the service provider's definitive position, it is essential that a tailored investigation is carried out which is thorough but also proportionate to the issues that have been raised.



It is for the investigating officer to decide what information is required and from where that information should be gathered.

When gathering evidence as part of an investigation, due regard should always be given to information that may be confidential, sensitive, restricted (e.g. in relation to relevant persons) or covered by data protection legislation, court orders, with consent to access records (such as medical records) being obtained where appropriate.

**43.** Relevant staff will be made aware of the investigating officer's role and will be asked to co-operate by providing any information requested, quickly and in full.

**44.** The staff involved in investigating must be of an appropriate level and suitably neutral in relation to the allegation. The investigative staff must have the authority to obtain relevant evidence and have full access to people, records and specialist advice if necessary.

Relevant evidence will normally include the child or family or professional's records, notes of conversations with the child or family or professional and details of the complaint itself, as well as any supporting correspondence or documentation, including relevant policies and procedures. Once the evidence is collated, it is good practice to prepare a chronology or history of the circumstances and events leading to the complaint. If there are gaps in the required information, these should be identified and further evidence collected.

**45.** Investigative staff can use various tools to establish the facts that they need to reach a decision. Staff should be given the resources to conduct interviews, make site visits and obtain independent professional advice if this is required. When investigating a complaint, wherever possible, staff who were originally involved in the issues being complained about should be spoken to as part of the investigation process.

Investigative staff will not, however, simply accept the account of staff without question. Where appropriate, and particularly where accounts differ, they will need to question explanations given by colleagues. They will, therefore, have the authority to do so.

**46.** The scale of the investigation will be proportionate to the issues complained about. The complaint handler will seek to establish:

- i** What should have happened?
- ii** What did happen?
- iii** What was the cause of any identified failings?
- iv** What can be done to rectify any failings?

**47.** The conclusion reached must be based on an objective analysis of the evidence and will provide a clear explanation of this analysis. It is essential that all points raised by the child or family or professional and agreed at the



start of the investigation, are properly and fully considered in SCRA's response. Multiple subjects of complaint relating to a similar issue can be grouped together or summarised.

**48.** The investigating officer will aim to resolve the complaint by either meeting the service user's expectations or, where this is not appropriate, providing a full explanation of the service provider's position.

### Using alternative dispute resolution

**49.** Some types of complaint are not easily resolved through written correspondence. Complaints handling staff will be aware of the different forms of dispute resolution available. They will be encouraged to use services such as mediation which can be a very effective tool in resolving service user dissatisfaction and can defuse problems before they escalate. Where parties agree, mediation can be used to facilitate communication between the service user and the person or organisation that they are complaining about, helping all concerned to get to the real issues and underlying concerns. SCRA has access to appropriately trained and qualified mediators.

#### The benefits of mediation:

- It provides an efficient and fair process.
- It enables both parties to understand what is driving the complaint.
- It is more likely to result in mutually satisfactory solutions being reached or special arrangements being made and put in place quickly.
- It often results in improved relationships and increased customer satisfaction rates.

### Communicating the decision

**50.** At the end of the investigation, SCRA's decision will be formally communicated to the service user, either face-to-face or in writing. Responses will be based on the facts established by the investigation and a full explanation will be given about how those facts were used to inform the conclusions reached. Literacy will not be assumed and the use of telephone contact may be appropriate if the child or family member has special needs, or where the subject matter to be communicated is sensitive. In these cases, it is good practice to communicate the information by telephone, followed by a letter.

**51.** Each of the issues agreed between SCRA and the child or family or professional as forming the complaint should be responded to in full. Correspondence should be clear and easy for the recipient to understand.



Investigating officers should take into account the specific needs of service users and provide material in a suitable format and in languages other than English if appropriate.

Technical language and jargon will be avoided where possible, or explained in lay terms. It may also be helpful to signpost complainants at this point to the role of advocates, if they require further assistance.

**52.** Where an investigation identifies a service failure and SCRA proposes to take action to resolve the dissatisfaction, the correspondence will include details of what will be done and when.

**53.** The final decision letter will tell the service user about their right to complain to the SPSO, should they be dissatisfied with the outcome of their complaint. It will inform the complainant that they should take their complaint to the SPSO within 12 months of becoming aware of the issue which gave rise to the complaint.

### **What if the child or family or professional remains dissatisfied?**

**54.** A thorough investigation leading to a full and objective response to the complaints, endorsed by senior management, will ensure that the definitive position has been established. Should the child or family or professional remain dissatisfied, further investigation by SCRA will not change that decision.

**55.** SCRA's final decision letter will have given the SPSO's contact details. The SPSO will consider complaints from the child or family or professional and may carry out its own investigation where there are indications that there may have been maladministration or service failure by SCRA. SCRA will ensure that complaints correspondence and details of their own investigation are available for review by the Ombudsman if required. SCRA staff will keep accurate records of their investigation and of any interviews or meetings held to discuss the complaint. These documents will be retained in line with SCRA's Records Management Policy.

### **Unacceptable behaviour by complainants**

**56.** People may act out of character in times of trouble or distress. If there have been upsetting or distressing circumstances leading up to a complaint, in a small number of cases this can lead to a service user acting in an unacceptable way. Examples of behaviour that may be considered unacceptable include: persistent refusal to accept explanations relating to what can or cannot be done about the complaint, and continuing to pursue a complaint without presenting any new information.

**57.** Behaviour should not be viewed as unacceptable just because a child or family or professional is forceful or determined. In fact, being persistent can be a positive advantage when pursuing a complaint. However, the actions of a child or family or professional who is angry, demanding or persistent may



result in unreasonable demands on time and resources or unacceptable behaviour towards staff. This is covered in SCRA's Dignity at Work Policy.

**58.** The threat or use of physical violence, verbal abuse or harassment towards staff may result in the ending of all direct contact with the child or family or professional. It may be appropriate to report incidents to the police. Incidents where physical violence is used or threatened should always be reported.

### Vexatious complaints

**59.** Most complaints made are reasonable, however, we may receive some complaints which we consider to be of a vexatious nature.

Features of a vexatious complaint may include the following:

- There appears to be insufficient or no grounds for the complaint.
- The complaint appears to have been made only to annoy or cause problems, or the complaint is regularly added to, or the focus of the complaint keeps changing.
- There is a refusal to co-operate with the complaints investigation process.
- What appears to be groundless complaints, are made about the staff members dealing with the issue, and efforts may be made to have them replaced or dismissed.
- The person making the complaint may make what appears to be an unreasonable number of contacts with us.

### How we will deal with vexatious complaints

**60.** If we consider a complaint to be of a vexatious nature, we will assess in the first instance whether the person making the complaint has been dealt with in a fair and open manner in line with our CHP. If it is felt the complaint has not been dealt with in a fair and open manner, then we will address this.

If a complaint is deemed as vexatious, Senior Management will then discuss the issue. We will then contact the complainant either by phone, in writing or by email to explain why we have deemed the complaint as vexatious.

We will identify the behaviour that is causing concern and ask the complainant to change their behaviour.

We will explain the actions that SCRA may take if the behaviour does not change. This may include restricting the complainant's contact with SCRA.

### Restrictions

**61.** Where behaviour is causing continued concern, we will issue a letter to the complainant advising them that the way in which they will be allowed to contact SCRA in the future will be restricted.



Any restriction that is imposed on the complainant's contact with SCRA will be appropriate and proportionate.

Restrictions will be tailored to deal with the individual circumstances of the complainant. Examples of restrictions may include:

- Requiring contact to take place with one named member of staff only.
- Restricting telephone calls to specified days / times / duration.
- Requiring any personal contact to take place in the presence of an appropriate witness.
- Banning the complainant from sending emails or calling particular members of staff.
- Banning the complainant from accessing any SCRA building, except by appointment.

When the decision has been taken to apply this policy to a complainant, we will contact the complainant in writing to explain: Why we have taken the decision ~ What action we are taking ~ The duration of that action ~ The review process of this policy, and the right of the complainant to contact the SPSO.

Support will be given by Senior Management to staff dealing with vexatious complaints.

## Redress

**62.** Redress can come in a number of forms and it is important that SCRA is not overly prescriptive in their approach. SCRA may propose a form of redress that will resolve their complaint. SCRA should always consider the child or family or professional's wishes and, if it is reasonable and legal to meet them, complaints handling staff should be encouraged to make the desired arrangements.

The child or family or professional's wishes will not, however, always be reasonable and there will, of course, be limits to SCRA's powers to provide certain remedies. Any failures should be acknowledged and remedied quickly and fairly and in a way that best reflects the extent of the problems encountered by the service user. Appropriate redress could include:

- An apology.
- An explanation.
- Correcting the error.

**63.** Generally, where service failings have been identified, SCRA should attempt, if possible, to put the child or family or professional back in the



position they were in before the error occurred. If this is not possible, then other forms of redress will be considered such as providing an explanation and apology.

**64.** SCRA will undertake to improve procedures or systems or implement staff training to address service failures where this is appropriate. The complainant will be told about action taken, although it is not appropriate to share specific details that affect individual staff members.

**65.** In many cases, the service user may want SCRA to acknowledge their shortcomings and apologise. Apologies will be unequivocal and SCRA will not apportion blame on the service user.

#### **Redress – key points:**

- A form of redress may be available and SCRA will always consider the service user's wishes.
- The approach to redress will be consistent, but adaptable to the specific circumstances of the complaint – a variety of redress options should be available to complaints handling staff.
- Suggestions made by service users will be considered and met if appropriate.



## Section 3

# Publicising, Recording, Learning and Improvement

### Introduction

66. This section provides detail about the methods SCRA will use to publicise the new CHP and the supporting information materials. It also outlines the mechanism SCRA uses to record complaints and highlights how the organisation can learn and improve from this new CHP.

### Publicising our Complaints Handling Procedure

67. SCRA's new CHP is easily accessible by children, young people and their families, as well as our partners in the Children's Hearings System, including Panel Members, Safeguarders, social workers and others.

68. The publicity material explains that it is a CHP and not a facility for feedback or comments. SCRA already has a mailbox for general feedback and comments – please email [communications@scra.gsi.gov.uk](mailto:communications@scra.gsi.gov.uk), and this is well publicised on the website and printed corporate material such as Annual Reports and information leaflets.

69. It is important to acknowledge that people might not use the actual word 'complaint' and the training provided to SCRA staff ensures that any issues/expressions of dissatisfaction, are still dealt with as a complaint under this new procedure.

### Complaints information

70. SCRA has tried to ensure that the appropriate information and materials are available to meet the needs of all our service users. SCRA has the following tools available:

a. **Printed information leaflet and complaints form.** This is a double sided A4 document, which has information on one side about SCRA's CHP and the other side is a simple form which people can fill in by hand to register their complaint. This form is available in reception areas in Hearing suites and also available on request from Reception staff or other members of SCRA staff.

b. **Website.** SCRA's website ([www.scra.gov.uk](http://www.scra.gov.uk)) contains a section on complaints. This can be accessed via the Contact Us tab which is clearly visible on the home page of our website.



The complaints section is split into four sections:

- General information about how to make a complaint.
- Who do I contact?
- What can I do if I am not happy with the outcome?
- Information about how to complain about others involved in the Hearings System.

**c. Electronic form.** The printed information leaflet and form mentioned in a above, is also available to complete in an electronic format on our website. This can be accessed via the complaints section/general information about how to make a complaint page.

**d. Complaints form for children and young people.** There are two separate electronic complaints forms on SCRA's website. One is aimed at children – 11 years and under, the other is aimed at young people, 12 years and over. These forms are available in an electronic format only. The language and design have been created to make the forms more appealing to children and young people.

**e. Your Rights cards.** A5 information cards are available in Hearings rooms for children and young people. These provide children and young people with information about their rights. It informs children and young people that amongst other rights, they have the right to complain. Children and young people are encouraged to take this card away from their Hearing with them.

Information about complaints, including the form, can be provided in other formats on request.

#### **Publicising the complaints handling procedure – key points:**

- A complaint is a 'complaint' – not 'feedback' or 'comments'.
- The CHP is easily found in SCRA's public information.
- The CHP is presented online and offline and in formats that recognise the varying needs of service users.
- Details of where to complain, who will deal with the complaint and how long it will take are readily available.



## Recording the complaint

**71.** SCRA recognises the value of information and intelligence received from complaints. It provides us with information following lessons learned and this can help improve our services and processes in the future.

**72.** To help SCRA roll out this new CHP, a new method of capturing complaints has been developed. This new system enables any member of SCRA staff to easily record the details of a complaint no matter whether it is dealt with through front line resolution or if it needs further investigation. There will be one point of contact for the service user to reduce the number of people dealing with the complaint.

The new system holds the information securely, enables the progress and outcome of any complaints that require further investigation to be easily recorded and reported on, has the ability to hold details of all correspondence in connection with a complaint and to record the timescales involved with the resolution of the complaint.

Complaints received from service users can easily be added into the same system to ensure all complaints are captured in one system and in a single location, ensuring complaint categories are kept consistent throughout.

The people responsible for administering complaints records have been fully trained in Data Protection requirements.

## Publishing complaints performance information

**73.** Information about complaints is published internally on a regular basis. This provides high level information about complaints and work being undertaken to improve our service as a result of complaints made.

**74.** SCRA will publish information externally about complaints on an annual basis through SCRA's website. This will include information about the numbers and types of complaints that have been received, as well as the outcomes of the complaints, what actions have been taken and whether the appropriate timescales were met.

Complaint handling reporting will demonstrate improvements that have taken place as a result of complaints and will help share best practice in service delivery.

## Learning from complaints

**75.** Details of common and re-occurring complaints will be regularly fed into SCRA's Service Improvement Group to ensure that process and service improvements can be identified and implemented. Feedback from service



users should be encouraged. Analysis of this information can be used to contribute to continuous service improvements and improving standards. Lessons learned will be shared with staff via internal communication channels.

### Training for SCRA staff

**76.** SCRA will ensure that all staff are provided with training to ensure they fully understand the CHP and how this procedure should be put into practice.


The training will include the following:

- A full understanding of the CHP and the individual's role in handling complaints.
- A full understanding of SCRA's approach to resolving complaints at the frontline or referring for further investigation.
- The different types of redress available to resolve complaints and options for alternative dispute resolution.
- A full understanding that staff are empowered to resolve complaints and that they have the authority to do so.
- A full understanding of SCRA's recording tool and, where appropriate, the skills to extract information from the database.

**77.** It is important that frontline employees and other staff have the skills and confidence to use the authority delegated to them. Therefore the basic CHP training will be supplemented by training in:

- Customer service.
- Data protection and Freedom of Information.
- Communicating with children and young people.

**78.** Mediators will be appropriately trained and qualified, and investigative staff will receive any training necessary to supplement their skills in investigation and information gathering.



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