

Complaints Policy

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Introduction

NHS Shared Business Services (NHS SBS) aims to exceed the expectations of its clients and other stakeholders with the quality of the services that it delivers. It values the feedback that they provide, including complaints about its services, regarding them as a form of feedback about its performance.

Purpose of & justification for the policy

Purpose

The purpose of this Policy is to define how NHS SBS regards complaints about NHS SBS's services. The Complaints Management Process specifies how they are managed.

NHS SBS regards a complaint a specific statement of concerns or informed intent that its author wishes it to be treated as such.

The aim of NHS SBS's Complaints Policy is to provide:

- A rapid, open and conciliatory response to a complaint that meets the needs of the complainant whilst being fair to NHS SBS
- Assurance that a complaint will not prejudice the service that NHS SBS provides, on behalf of its clients.

The objectives of NHS SBS's Complaints Policy are:

- To give complaints and their management a high priority within NHS SBS
- To use complaints as a source of information for NHS SBS managers to guide the improvement of services
- To ensure the NHS SBS complaints process is managed effectively and efficiently NHS SBS aims to fulfil the aims and objectives of this Complaints Policy by:
 - operating a Complaints Management Process that deals with complaints in a timely and appropriate manner
 - acting to address complaints at source and as they arise
 - responding to complaints with appropriate actions
 - being pro-active in addressing problems as and when they arise, thus reducing the need for clients or service users to complain in order to obtain

- a resolution
 - empowering all employees – and especially front-line, customer-facing employees – to receive and resolve minor comments, issues and problems immediately and informally
- explaining to clients and service users how they should complain and the service that they should expect in response:
 - Acknowledgement of receipt of a complaint – within two working days of receipt by the Line of Business
 - Response to the complaint – within 30-working days of acknowledgement.
 - If the complaint is complex a longer period can be negotiated with the individual at a local level.
- monitoring its performance in achieving these Service Levels in its management of complaints
- routinely reviewing its performance in terms of complaints about its services and its management of those complaints

Scope

This Policy is for the management of formal complaints is in line with the Department of Health's Complaints Policy, its underlying process (<http://www.dh.gov.uk/health/contact-dh/dh-complaints>) and associated legislation but it does not duplicate or overlap with its coverage or the issues that they cover, but interprets them in the context of NHS SBS's business and ongoing developments in the organisation of the NHS.

Exclusions

This Policy does not cover the management of complaints about NHS SBS from NHS SBS employees; this is covered by internal policies and procedures.

This Policy does not cover the management of complaints about health services from users of NHS services delivered by contractual clients or their suppliers, outside of the scope of the services which NHS SBS provides.

This policy does not cover the management of complaints from suppliers to NHS SBS raising a complaint about payment because this is dealt with by a Sopra Steria process.

Definitions

Definition of a Complaint

As part of its close working with the NHS, NHS SBS has adopted the definition of a complaint proposed by the NHS Executive, namely that a formal complaint is:

'An expression of dissatisfaction with the services provided by the organisation or individual, whether verbal or written, that requires a response.'

The definition of an informal complaint is:

'A matter that requires a follow-up action but not a full investigation.'

NHS SBS also recognises a complaint as a problem that is brought to the attention of NHS SBS, by a client or supplier, where there is an expectation to address a situation. The expectation is that this action is over and above simply supplying the original service that was the cause of the complaint.

Complainants

This Policy recognises the following types of stakeholder complainant:

- NHS SBS's contractual clients
- Users of NHS SBS's services (including suppliers to NHS organisations)
- NHS SBS third party named suppliers

Different service lines have different users, as Table 1 below shows:

SERVICE LINE	USERS (APART FROM CONTRACTUAL CLIENTS)
Finance & Accounting	<ul style="list-style-type: none"> • NHS supplier organisations such as Performer Practices • Commercial and other suppliers • Debtors
Procurement	<ul style="list-style-type: none"> • Commercial Suppliers
Employment Services	<ul style="list-style-type: none"> • Employees from NHS organisations
Corporate	<ul style="list-style-type: none"> • Incorporating all of the above areas

Table 1: Users of each Service Line, apart from Contractual Clients

Context of Contact

This Policy recognises that a client or user should first make contact with NHS SBS with an enquiry, an issue or to raise an informal complaint.

A client or user commonly issues a complaint if NHS SBS has not resolved an issue or responded to an enquiry to the client's or user's satisfaction. As it becomes a complaint, the complainant might escalate an issue within the complainant organisation.

Responsibilities

The Marketing and Communications Director is accountable to the NHS SBS Executive Board for the publication and distribution of this Policy.

The Line of Business Directors are accountable for the management in their areas and adherence to the KPIs set out in the policy.

The Line of Business Service Excellence Lead is responsible for the operational management of complaints in accordance with the KPIs, and reporting of performance on a monthly basis at a line of business and enterprise level.

Monitoring Implementation and Effectiveness of this Policy:

The NHS SBS Executive Committee monitors the implementation and effectiveness of this Policy.

Monitoring Performance of the organisation:

The Enterprise Customer Excellence Board is responsible for monitoring the performance of complaints across the organisation.

The Line of Business Director is accountable to the Customer Excellence Board for the management and performance of complaints in their area.

The Line of Business Service Excellence are responsible for managing operational performance within their lines of business and reporting volumes and KPI performance.

Managing Performance in each Line of Business

The Line of Business Director is accountable for the management and performance of complaints in their area.

The Line of Business Service Excellence lead is responsible for the management of complaints and operational performance. Specifically:

- Teams are aware of the complaints policy and KPIs and receive appropriate training on how to manage complaints.
- Teams are following the process for handling of formal complaints as outlined in the NHS SBS complaints policy and the local standard operating procedures
- Providing accurate monthly complaints volumes and KPI performance to the local management team, local Service Excellence Board, Enterprise Customer Excellence and Operational Review Board detailing volumes, agreed KPIs and action plans.
- Introducing action plans to drive improvements across complaints management.
- Representing the Line of Business in a formal complaints meeting hosted by the Marketing and Communications Director

Policy

Receiving a complaint and passing on a compliment.

A formal complaint should be received in writing, preferably via our corporate website form which is available on: [NHS SBS Corporate - Have Your Say](#), or sent via hard copy to:

Complaints, NHS Shared Business Services, 1st Floor, Munroe Court, White Rose Office Park, Millshaw Park Lane, Leeds LS11 0EA

If a formal complaint is received outside of this process, i.e. made to the sales team or via commercial, it will be forwarded by the recipient to the appropriate department to handle, in accordance with the complaints policy.

Informal complaints can be raised over the telephone, via email or during a meeting.

Information required

The complainant is encouraged to state whether they are raising an informal or formal complaint and should provide as much information as possible to enable a full investigation of the complaint and this should include the following:

- complainants name, email and postal addresses and contact telephone number;
- a clear description of the complaint;
- copies of any previous related correspondence;
- any reference numbers or other useful information.

Management of the Formal Complaint Locally

The formal complaint will be managed in the timeframes set out in the corporate complaints policy and the approach set out in the local Standard Operating Procedures.

Timescales for acknowledging and resolving a formal complaint

- Acknowledge the complaint within two working days of receipt
- Following investigation, we have an aspiration to provide a full written response to all complaints within 30-working days from date of acknowledgement, where possible detailing the final outcome of the complaint, or a performance target of at least 80% within 30-working days from the date of acknowledgement.
- If we are unable to provide a full response within this timeline, we will let the complainant know and provide a realistic estimate of when we can provide a full reply
- We will keep a record of the complaint on an internal log so we can monitor our progress

Investigating a formal complaint

We will thoroughly review all of the related material, including relevant correspondence between NHS SBS, the complainant and any relevant organisations, as well as a full review of any relevant records held within NHS SBS. Where appropriate this may also involve liaising with NHS SBS operational teams and external contacts. At the end of the investigation, we will send a full written response will be made detailing the final outcome.

Management of Informal Complaints

Informal complaints are captured and managed locally by the service delivery teams, service management or client partnership team on their CRMs or reporting tools, and the business makes every effort to respond within 30-working days..

Unresolved complaints

If you are not satisfied with the final outcome of the complaint, we will escalate the matter to the Director of Marketing and Communications for further review and action.

In the unlikely event of an unsatisfactory resolution to your complaint, we will continue to work with you and other relevant external parties in accordance with our contractual obligations.

Implementation and Monitoring

Implementation

The Complaints Management Process implements this Complaints Management Policy by defining the process that the organisation follows in order to manage complaints.

The Complaints Management Process is common across all areas of the NHS SBS organisation, with fulfilment of the complaint in accordance with local standard operating procedure specific to individual service lines.

Process for monitoring implementation & effectiveness

For this policy, the following monitoring processes are in place.

Standard	Monitoring process
Complaint acknowledgement within two working days of receipt	Internal log / Corporate Complaint Dashboard
Full written response within 30 working days from date of acknowledgement, detailing the final outcome of the complaint (unless other date pre-agreed with complainant)	Internal log / Corporate Complaint Dashboard
Monthly complaints reporting and monitoring	Line of business and corporate dashboard via the Customer Excellence Board Line of business and corporate dashboard via the Enterprise Operational Review Board

Dissemination & Access to the Policy

Dissemination of and access to the policy

Within NHS SBS, Managers make their employees aware of the Policy and its implications for their work areas through internal communications and team briefings.

The Director of Marketing and Communication issues this Policy via nominated leads within each Service Line.

These nominated persons ensure that all employees are aware of the policy and able to access it. They also act as the lead contact officers within their respective Service Line.

The Privacy, Risk and Counter Fraud Service ensures that the current version of the Policy is stored centrally alongside other company policies for ease of access by employees in all locations.

NHS SBS Client Managers, Account Managers and Commercial Advisors ensure that clients and suppliers are aware of the public interpretation of the "Complaints Policy" and of the process for making complaints.

Review Updating & Archiving

The Privacy, Risk and Counter Fraud Co-Ordinator maintains an archive of all policy documents.

The Director of Marketing and Communications ensures that this Policy is reviewed every 18-months unless there are any legislative changes, in which case the NHS SBS Executive Committee will review the Policy in light of legislative changes as soon as.

Compliments

Compliments will also be passed on to our teams and individuals in a timely manner. Where learning can be gained from feedback this will be taken into consideration in future processes and planning.

References

This policy has been written in conjunction with the following:

- Internal HR policies for complaints about NHS SBS made by our employees
- NHS SBS HR Policies and Procedures
- NHS SBS Incident Management Policy
- NHS SBS SIRI Management Policy
- NHS SBS Complaints Management Process
- NHS SBS Complaints Management Procedures
- The NHS Complaints Regulations 2004

Version Control Sheet

If revising a policy/procedure summarise the key changes made in the comments column.

Where a policy/procedure replaces a previous version, the old version will be archived in accordance with the Policy for the Development and Management of Policies and Procedures.

Version	Date	Author(s)	Job Title	Comment
0.1	01 Jan 2008	Peter Bruce	Client Director	Approved
3	August 2012	Jonathan Matthews	Business Consultant	Major rewrite
3.2	September 2012	Jonathan Matthews	Business Consultant	Document restructured as Policy-Process-Procedures and revised

				and extended at all levels
3.3	November 2012	Jonathan Matthews	Business Consultant	Changed name from Complaints Management Policy to Complaints Policy
3.4	February 2014	Sabrina Nneke	Marketing Communication Consultant	Revision
3.5	October 2014	Gail Gillatt	Corporate Marketing Manager	Revision
3.6	November 2014	Gail Gillet	Corporate Marketing Manager	Revision
3.7	December 2014	Nicholas Murphy-O'Kane	Head of Corporate Governance	Feedback from consultation
4.0	January 2015	Gail Gillatt	Corporate Marketing Manager	Approved Update
4.1	April 2016	Kirstie Hartlebury	Information Governance Administrator	Review
5.0	May 2016	Gail Gillatt	Head of Marketing & Communications	Approved Update
5.1	June 2016	Kirstie Hartlebury	Information Governance Administrator	Formatting amendments
5.2	June 2017	Raine Hunt	Director of Marketing and Communications	Revisions

5.3	July 2017	Raine Hunt	Director of Marketing and Communications	Revisions following consultation period
6.0	July 2017	Raine Hunt	Director or Marketing and Communications	Approved Version
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