



**THE GALKAYO EDUCATION CENTER FOR PEACE
AND DEVELOPMENT (GECPD)**

**COMPLAINTS, RESPONSE MECHANISM AND
ACCOUNTABILITY FRAMEWORK (CRM&AF)**

Complaints Handling Guidelines and Procedure

Issued: October 2016

The GECPD Complaints Handling Procedure (CHP)

Foreword

Our complaints handling procedure reflects GECPD's commitment to valuing complaints. It seeks to resolve client dissatisfaction as close as possible to the point of service delivery. It also seeks to conduct thorough, impartial and fair investigations of client complaints. Then, where appropriate, we can make evidence-based decisions on the facts of the case.

This procedure aims to help us resolve problems successfully at the first time of asking. We want quicker, simpler and more streamlined complaints handling with local, early resolution by capable, well-trained staff. The procedure will enable us to tackle a client's concerns properly and may prevent the same things going wrong for other people.

Complaints give us valuable information we can use to improve clients satisfaction. They give our staff a first-hand account of the clients' views and experience, and can highlight problems we may otherwise miss. Handled well, complaints can give our customers redress when things go wrong, and can also help us continuously improve our services.

Resolving complaints early creates better client relations. Sorting them out quickly and as close to the point of service as possible means they are less likely to escalate to the next stage of the procedure. Complaints that we do not resolve swiftly can greatly add to our workload.

This complaints handling procedure will help us do our work better, improve relationships with our clients and enhance GECPD's reputation. It will also help us keep students and other clients at the heart of what we do.

How to use this Model Complaints Handling Procedure.....	1
What is a complaint?	2
Handling anonymous complaints.....	3
What if the customer doesn't want to complain?	3
Who can make a complaint?.....	4
Complaints involving more than one department or organisation.....	4
The complaints handling process	6
Stage one: frontline resolution	6
What to do when you receive a complaint	7
What exactly is the customer's complaint (or complaints)?.....	8
What does the customer want to achieve by complaining?	8
Can I achieve this, or explain why not?	8
If I can't resolve this, who can help with frontline resolution?.....	8
Timelines	8
Extension to the timeline.....	9
Closing the complaint at the frontline resolution stage.....	10
When to escalate to the investigation stage	10
Stage two: investigation.....	11
What to do when you receive a complaint for investigation.....	11
Timelines	12
Extension to the timeline.....	12
Mediation.....	13
Closing the complaint at the investigation stage	14
Independent external review	14
Governance of the Complaints Handling Procedure	15
Roles and responsibilities.....	15
Complaints about academic staff	16
Recording, reporting, learning and publicising	17
Recording complaints	17
Reporting of complaints.....	18
Learning from complaints	18
Publicising complaints performance information	19
Maintaining confidentiality.....	19
Managing unacceptable behaviour	19
Supporting the customer	20
Time limit for making complaints	20
Appendix 1	22
Timelines	22
Appendix 2	26
The complaints handling procedure.....	26

What is a complaint?

GECPD's definition of a complaint is:

'A formal expression of dissatisfaction or discontent by one or more clients about the actions of GECPD and its staff, or about the standard of services provided by GECPD or on its behalf.'

A complaint may relate to, for example:

- a failure to provide a service
- an inadequate quality or standard of service
- the admissions process
- the disciplinary process
- a request for a service or for information which has not been acted upon or answered
- our policies
- wrong information about academic programmes or GECPD services
- the quality and availability of facilities and learning resources
- accessibility of our buildings or services
- the behaviour of a member of staff or contractor
- a student's behaviour
- treatment by or attitude of a member of staff or contractor
- disagreement with a decision where the client cannot use another procedure (such as an appeal) to resolve the matter
- our failure to follow the proper administrative process.

This list is not exhaustive and other forms of complaints could be reported.

A complaint is not:

- a routine first-time request for a service
 - a request for information or an explanation of policy or practice
 - a disagreement with academic judgement
 - a claim for compensation from GECPD
-

-
- issues that are in court or have already been heard by a court or tribunal
 - disagreement with a decision where a right of appeal exists
 - a request for confidential information
 - a grievance by a member of staff
 - an attempt to have us reopen or reconsider a complaint we have concluded or given our final decision on.

You must not treat these issues as complaints. Instead, direct clients to use the right procedures.

Handling anonymous complaints

At GECPD, we value all complaints. This means we treat all complaints seriously including anonymous ones and will take action to consider them further, wherever it is proper to do so. Generally, we will consider an anonymous complaint if it gives enough information for us to make further enquiries. Failing this, we may decide not to pursue it. A decision not to pursue an anonymous complaint must be authorised by the Executive Director or any other delegated/responsible senior manager.

If an anonymous complaint contains serious allegations, it must be referred to the Executive Director or a senior manager immediately.

If we pursue an anonymous complaint, we will record the issues as an anonymous complaint on the complaints system. This will help ensure the completeness of the complaints data we record and allow us to take corrective action where suitable.

What if the client doesn't want to complain?

We regard as complaints all expressions of dissatisfaction that meet our definition of a complaint. If someone does not want to begin the formal complaints procedure, we will still record their dissatisfaction as a complaint so that we can take the opportunity to improve services. We should encourage clients to submit their complaint and allow us to deal with it

through the procedure. This will ensure they are updated on the action we take and get a timely response to their complaint. If, however, the client insists they do not wish to complain, we will record the issue as an anonymous complaint. This will ensure that:

1. we do not record their details on the complaints database
2. we do not contact them again about the matter, and
3. the complaints data we record are complete, while enabling us to fully consider the matter and take corrective action where suitable.

Who can make a complaint?

Anyone who receives, requests or is affected by our services can make a complaint. Sometimes a client may be unable or reluctant to make a complaint on their own. We will accept complaints brought by third parties as long as the client has given their personal consent.

GECPD will support individuals or organisations wishing to complain about an aspect of its service. This is because we want to understand the nature of the complaint and how it might need to respond if a service is substandard or failing. This may include involving outside support, e.g. advocacy services, to help the customer.

Complaints involving more than one department or organisation

If a complaint relates to the actions of two or more GECPD departments/centers, you must:

- tell the client who will take the lead in dealing with the complaint, and
- explain that they will get only one response covering all issues raised.

If a client complains to GECPD about the service of another body, but GECPD is not involved in the issue, you should advise the client to contact the other body directly.

However, you must handle a complaint through this procedure if it directly relates to GECPD service and the service of another body. The other body could be, for example, a school or contractor providing a service on GECPD's behalf or the provider of catering services. If you need to make enquiries to an outside body about the complaint, always take account of data protection and the guidance on handling our clients' personal information.

The complaints handling process

GECPD's CHP aims to provide a quick, simple and streamlined process for resolving complaints early and locally by capable, well-trained staff.

Our complaints process provides two opportunities to resolve complaints internally:

1. frontline resolution, and
2. investigation.

For clarity, the term '**frontline resolution**' refers to the first stage of the complaints process.

It does not reflect any job description within GECPD but means seeking to resolve

complaints at the initial point of contact where possible.

STAGE ONE: FRONTLINE RESOLUTION

Frontline resolution aims to quickly resolve straightforward customer complaints that require little or no investigation. **Any member of staff may deal with complaints at this stage unless they are the subject of the complaint or have a clear conflict in the matter. In this instance the complaint should be handed to a first line manager within the department or faculty for resolution.**

The main principle is to seek early resolution, resolving complaints at the earliest opportunity and as close to the point of service as possible. This may mean a face-to-face discussion with the client, or asking a suitable member of staff to deal directly with the complaint.

In practice, frontline resolution means resolving the complaint at the first point of contact with the client. This can be done by the member of staff receiving the complaint or other appropriate staff.

In either case, you may settle the complaint by:

- providing an on-the-spot apology where suitable, and/or
- explaining why the problem occurred and, where possible, what will be done to stop it happening again.

You may also explain that we value complaints and may use the information the client has given when we review service standards in the future.

A client can make a complaint in **writing, in person, by telephone, by email or online, or by having someone complain on their behalf**. You must always consider frontline resolution, regardless of how you have received the client's complaint.

What to do when you receive a complaint

1. On receiving a complaint, you must first decide whether the issue can indeed be defined as a complaint. The client may express dissatisfaction about more than one issue. This may mean you treat one element as a complaint, while directing the customer to pursue another element through an alternative route.
 2. If you have received and identified a complaint, record the details on our complaints system.
 3. Next, decide whether or not the complaint is suitable for frontline resolution. Some complaints will need to be fully investigated before you can give the customer a suitable response. You must escalate these complaints immediately to the investigation stage.
 4. Where you think frontline resolution is appropriate, you must consider four key questions:
 - What exactly is the client's complaint (or complaints)?
 - What does the client want to achieve by complaining?
-

-
- Can I achieve this, or explain why not?
 - If I can't resolve this, who can help with frontline resolution?

What exactly is the client's complaint (or complaints)?

It is important to be clear about exactly what the client is complaining of. You may need to ask the client supplementary questions to get a full picture.

What does the client want to achieve by complaining?

At the outset, clarify the outcome the client wants. Of course, the client may not be clear about this, so you may need to probe further to find out what they expect and whether they can be satisfied.

Can I achieve this, or explain why not?

If you can achieve the expected outcome by providing an on-the-spot apology or explain why you cannot achieve it, you should do so. If you consider an apology is suitable, you may do so.

The client may expect more than we can provide. If so, you must tell them as soon as possible. An example may be where the client is so dissatisfied with the location and day of training that they demand both be changed, but we are only able to consider changing its location.

You are likely to have to give the decision face to face or by telephone. If you respond face to face, by telephone or by email, you need not write to the client as well but you may choose to do so. It is important, however, to keep a full and accurate record of the decision you have reached and passed to the client.

If I can't resolve this, who can help with frontline resolution?

If you cannot deal with the complaint because, for example, you are unfamiliar with the issues or area of service involved, pass details of the complaint to someone who can try to resolve it.

Timelines

Frontline resolution must be completed within **five working days**, although in practice we would often expect to resolve the complaint much sooner.

You may need to get more information from other departments to resolve the complaint at this stage. However, it is important to respond to the client within five working days, either resolving the matter or explaining that GECPD will investigate their complaint.

Extension to the timeline

In exceptional circumstances, where there are clear and justifiable reasons for doing so, you may agree an extension of no more than five working days with the client. This must only happen when an extension will make it more likely that the complaint will be resolved through frontline resolution.

When you ask for an extension, you must get authorisation from the appropriate senior manager, who will decide whether you need an extension to effectively resolve the complaint. Examples of when this may be suitable include staff (or contractors) being temporarily unavailable. If, however, the issues are so complex that they cannot be resolved in five days, it is right to escalate the complaint straight to the investigation stage. Where appropriate you must tell the client about the reasons for the delay, and when they can expect your response.

If the client does not agree to an extension but it is unavoidable and reasonable, a senior manager must decide on the extension. You must then tell the client about the delay and explain why the extension has been granted.

It is important that such extensions do not become the norm; only rarely should you extend the timeline at the frontline resolution stage. All attempts to resolve the complaint at this stage must take no longer than **ten working days** from the date you receive the complaint.

The proportion of complaints that exceed the five-day limit will be evident from reported statistics. These statistics must go to our senior management team on a quarterly basis.

Appendix 1 provides further information on timelines.

Closing the complaint at the frontline resolution stage

When you have informed the client of the outcome, you do not have to write to them as well, but you may choose to do so or the client may ask you to do so. You must ensure that our response to the complaint addresses all the topics we are responsible for and explains the reasons for our decision. It is also important to keep a full and accurate record of the decision you have reached and given to the client. You should then close the complaint and update the complaints system accordingly.

When to escalate to the investigation stage

You must escalate a complaint to the investigation stage when:

- you tried frontline resolution but the client remains dissatisfied and requests an investigation. This may happen immediately when you communicate the decision at the frontline stage, or some time later
- the client refuses to take part in frontline resolution
- the issues raised are complex and require detailed investigation
- the complaint relates to serious, high-risk or high-profile issues.

When you escalate a previously closed complaint from the frontline resolution stage, you should reopen the complaint on the complaints system.

Take special care to identify complaints that might:

- be serious, high risk or high profile, as these may require particular action, for example
- escalation to the Executive Director, or raise critical issues that need senior management's direct input.

We define potential high-risk or high-profile complaints as involving:

- an allegation of corruption against a GECPD employee
 - a claim of dereliction of duty by a GECPD employee
-

-
- a claim of personal injury that has incapacitated the client
 - a potentially significant risk to GECPD's operations
 - a claim of discrimination
 - an allegation of significant harm or abuse or where there is a suspicion that someone may suffer significant harm
 - serious service failure, for example major delays in providing, or repeated failures to provide, a service
 - significant and ongoing media interest.

You must hand over all case notes and associated information to the officer responsible for stage two, and record that you have done so.

STAGE TWO: INVESTIGATION

Not all complaints are suitable for frontline resolution and not all complaints will be satisfactorily resolved at that stage. Complaints handled at the investigation stage are typically complex or require a detailed examination before we can state our position. These complaints may already have been considered at the frontline resolution stage, or they may have been identified from the start as needing immediate investigation.

An investigation aims to establish all the facts relevant to the points made in the complaint and to give the client a full, objective and proportionate response that represents our final position.

What to do when you receive a complaint for investigation

It is important to be clear from the start of the investigation stage exactly what you are investigating, and to ensure that both the client and the service understand the investigation's scope.

It may be helpful to discuss and confirm these points with the client at the outset, to establish why they are dissatisfied and whether the outcome they are looking for sounds realistic. In discussing the complaint with the client, consider three key questions:

-
1. What specifically is the client's complaint or complaints?
 2. What does the client want to achieve by complaining?
 3. Are the client's expectations realistic and achievable?

It may be that the client expects more than we can provide. If so, you must make this clear to the client as soon as possible.

Where possible, you should also clarify what extra information you will need to investigate the complaint. The client may need to provide more evidence to help us reach a decision.

You must record details of the complaint on the system for doing so. Where appropriate, do this as a continuation of frontline resolution. Update the details when the investigation ends.

If the investigation stage follows attempted frontline resolution, you must hand over all case notes and associated information to the officer responsible for the investigation, and record that you have done so.

Timelines

The following deadlines shall apply to cases at the investigation stage:

- complaints must be acknowledged within **three working days**
- a full response to the complaint must be given to the client as soon as possible but not later than **20 working days** from the time the complaint was received for investigation.

Extension to the timeline

Not all investigations will be able to meet this deadline. For example, some complaints are so complex that they require careful consideration and detailed investigation beyond the 20-day limit. However, these would be the exception and we will always try to deliver a final response to a complaint within 20 working days.

If there are clear and justifiable reasons for extending the timescale, senior management will set time limits on any extended investigation, as long as the

customer agrees. You must keep the client updated on the reason for the delay and give them a revised timescale for completion. If the client does not agree to an extension but it is unavoidable and reasonable, then senior management must consider and confirm the extension. The reasons for an extension might include the following:

- Essential accounts or statements, crucial to establishing the circumstances of the case, are needed from staff, clients or others but they cannot help because of long-term sickness or leave.
- You cannot obtain further essential information within normal timescales, but have a reasonable expectation of doing so if there was an extension.
- Operations are disrupted by unforeseen or unavoidable events, for example breakout of armed conflict or severe weather.
- The client has agreed to mediation as a potential way of resolution.

These are only a few examples, and you must judge each case on its merits. However, an extension would be the exception and you must always try to deliver a final response to the complaint within 20 working days.

As with complaints considered at the frontline stage, the proportion of complaints that exceed the 20-day limit will be evident from reported statistics. These statistics must go to the senior management team on a quarterly basis.

Appendix 3 provides further information on timelines.

Mediation

Some complex complaints, or complaints where clients and other interested parties have become entrenched in their position, may require a different approach to resolving the complaint. Where appropriate, you may consider using services such as mediation or conciliation using suitably trained and qualified mediators to try to resolve the matter and to reduce the risk of the complaint escalating.

Mediation will help both parties understand what has caused the complaint, so is more likely to lead to mutually satisfactory outcomes. If you and the client agree to mediation, revised timescales will need to be agreed.

Closing the complaint at the investigation stage

You must let the client know the outcome of the investigation in writing or by their preferred contact method. Our response to the complaint must address all areas we are responsible for and explain the reasons for our decision. You must record the decision, and details of how it was communicated to the client, on the system for recording complaints.

Independent external review

Once the investigation stage has been completed, if the client is still dissatisfied with the decision or the way we dealt with the complaint, they can seek mediation from external sources such as the local authorities or line ministry. **In all cases, the complaint must first have been considered by the college.**

Governance of the Complaints Handling Procedure

Roles and responsibilities

Overall responsibility for the management of complaints lies with the GECPD Executive Director and senior management, who are accountable to our Board of Directors.

Our final position on the complaint must be signed off by an appropriate senior officer and we will confirm that this is our final response. This ensures that our senior management own and are accountable for the decision. It also reassures the customer that their concerns have been taken seriously.

The following explains the roles and responsibilities in complaints handling for each level of the organisation.

Executive Director: *The Executive Director provides leadership and direction in ways that guide and enable us to perform effectively across all services. This includes ensuring that there is an effective CHP, with a robust investigation process that demonstrates how we learn from the complaints we receive. The Executive Director may take a personal interest in all or some complaints, or may delegate responsibility for the CHP to senior staff. Regular management reports assure the Executive Director of the quality of complaints performance.*

Administration Manager: *On the Executive Director's behalf, Administrations Manager may be responsible for:*

- *managing complaints and the way we learn from them*
- *overseeing the implementation of actions required as a result of a complaint*
- *investigating complaints*
- *deputising for the Executive Director on occasion.*

However, Administrations Manager may decide to delegate some elements of complaints handling (such as investigations and the drafting of response letters) to other senior staff. Where this happens, Administrations Manager

should retain ownership and accountability for the management and reporting of complaints. They may also be responsible for preparing and signing decision letters to clients, so they should be satisfied that the investigation is complete and that their response addresses all aspects of the complaint.

Heads of Department / Project Officers/ School Directors: *may be involved in the operational investigation and management of complaints handling. As senior officers they may be responsible for preparing and signing decision letters to clients, so they should be satisfied that the investigation is complete and their response addresses all aspects of the complaint.*

Complaints Investigator: *The complaints investigator is responsible and accountable for the management of the investigation. They may work in a department or as part of a centralised team. They will be involved in the investigation and in co-ordinating all aspects of the response to the client. This may include preparing a comprehensive written report, including details of any procedural changes in service delivery that could result in wider opportunities for learning across the organization.*

All staff: *A complaint may be made to any member of staff of the organization. So all staff must be aware of the CHP and how to handle and record complaints at the frontline stage. They should also be aware of who to refer a complaint to, in case they are unable to personally handle the matter. We encourage all staff to try to resolve complaints early, as close to the point of service delivery as possible, and quickly to prevent escalation.*

Complaints about staff

Complaints about staff can be difficult to handle, as there may be a conflict of interest for the staff investigating the complaint. When serious complaints are raised against staff, it is very important that someone independent of the situation conducts the investigation. We must ensure we have strong governance arrangements that set out clear procedures for handling such complaints.

Recording, reporting, learning and publicising

Complaints provide valuable client feedback. One of the aims of this procedure is to identify opportunities to improve services across the organization. We must record all complaints systematically so that we can use the data for analysis and management reporting. By doing so, we can identify and tackle what causes complaints. Also, where appropriate, we can identify training opportunities and improve our service.

Recording complaints

To collect suitable data we must record all complaints in line with the following as the minimum requirements:

- The client's name and address.
- The date we received the complaint.
- The nature of the complaint.
- How we received the complaint.
- The department/center the complaint refers to.
- The date we closed the complaint at frontline resolution stage, if we did.
- The date we escalated the complaint to the investigation stage, if we did.
- Any action we took at the investigation stage.
- The date we closed the complaint was closed at the investigation stage, if we did.
- The complaint's outcome at each stage.
- The complaint's underlying cause and any remedial action we took.

We have structured systems for recording complaints, their outcomes and any resulting action. These provide a detailed record of services that have failed to satisfy clients.

Reporting of complaints

We analyse complaint details for trend information to ensure we identify service failures and take appropriate action. By regularly reporting on our analysis, management will be informed where services need to improve.

On a quarterly basis we will publish the outcome of complaints and our actions in response. This shows the improvements arising from complaints, and that complaints can influence our services.

It also helps to ensure transparency in our complaints handling and reassure our clients that we value their complaints. We must:

- publicise on a quarterly basis complaints outcomes, trends and actions taken
- use case studies and examples to show how complaints have helped improve services.

We should report this information regularly (at least quarterly) to our senior management team.

Learning from complaints

At the earliest opportunity after closing the complaint, the complaint handler must inform the client and staff of the relevant department about the investigation's findings and any recommendations.

Senior management will regularly review the information gathered from complaints and consider whether we could improve our services or update our internal policies and procedures.

As a minimum, we must:

- use complaints data to identify the root cause of complaints
 - take action to reduce the risk of recurrence
 - record the details of corrective action in the complaints file, and
-

-
- systematically review complaints performance reports to improve service delivery.

Where we have found that our services should be improved, we must:

- authorise the action needed to improve services
- designate an officer (or team) as the issue's 'owner', with responsibility for ensuring the action is taken and by when
- ensure the designated officer follows up to ensure the action is taken by the agreed date
- where appropriate, monitor performance in the service area to ensure the issue has been resolved
- ensure that our staff learn from complaints.

Publicising complaints performance information

We also report annually on our performance in handling complaints. This includes statistics showing the volume and type of complaint as well as key performance details, for example on the time we took to resolve complaints and at what stage they were resolved.

Maintaining confidentiality

Confidentiality is important in complaints handling. It includes maintaining the client's confidentiality and explaining to them the importance of confidentiality generally. We must always bear in mind legal requirements, as well as internal policies on confidentiality and the use of clients' information.

Managing unacceptable behaviour

In times of trouble or distress, people may act out of character. The circumstances leading to a complaint may result in the client acting unacceptably. Clients who have a history of challenging or inappropriate

behaviour, or have difficulty expressing themselves, may still have a legitimate grievance.

A client's reasons for complaining may contribute to how they present their complaint. Regardless of this, we must treat all complaints seriously and properly assess them. However, the actions of clients who are angry, demanding or persistent may result in unreasonable demands on time and resources or unacceptable behaviour towards our staff. We will therefore apply our policies and procedures to protect staff from behaviour such as unreasonable persistence, threats or offensiveness from clients. If we decide to restrict a client's contact with us under our unacceptable actions policy, we have a procedure for communicating that decision to them, notifying them of their right of appeal, and reviewing any decision to restrict contact with us. This will allow the client to demonstrate a more reasonable approach later.

Supporting the client

Everyone has an equal right of access to our CHP. Clients who do not have Somali as a first language may need help with interpretation and translation services. Others may have specific needs that we will seek to meet to ensure easy access to the procedure.

We must always take into account our commitment and responsibility to equality. Where appropriate, this includes making reasonable adjustments to our service to help the client.

Several support and advocacy groups are available to support clients in pursuing a complaint. You should tell clients about them if need be.

Time limit for making complaints

The client has six months to put their complaint to us, starting from when they first knew of the problem. For us to accept a complaint outside this time, there have to be special circumstances. We will use discretion when applying this time limit.

If it is clear that a decision not to investigate a client's complaint will lead to a request for external review of the matter, we may decide that this satisfies the special circumstances criterion. This will enable us to consider the complaint and try to resolve it.

Appendix 1

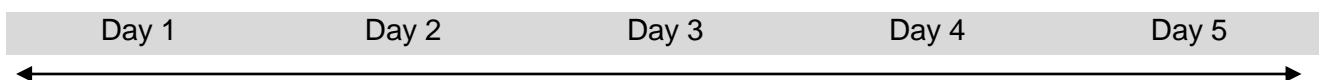
Timelines

General

In this procedure, 'day' means a working day. When measuring performance against the required timelines, we ignore non-working days such as Fridays, public holidays and days when other external circumstances such as conflict interrupts our service.

Timelines at frontline resolution

You must aim to achieve frontline resolution within five working days. The day you receive the complaint is day 1. Where you receive it on a non-working day, for example on a Friday or on a public holiday, day 1 will be the next working day.



Day 1:

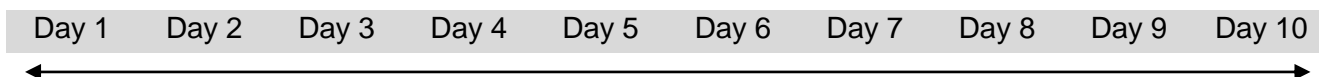
Day we receive the complaint, or the next working day if the date of receipt is a non-working day.

Day 5:

Frontline resolution achieved or complaint escalated to the investigation stage.

Extension to the five-day timeline

If you have extended the timeline at the frontline resolution stage in line with the procedure, the revised response time must be not longer than 10 working days from the date we receive the complaint.



Day 1:

Day we receive the complaint, or the next working day if the date of receipt is a non-working day.

In a few cases where it is clearly essential to achieve early resolution, you may authorise an extension within five working days from when we received the complaint. You must conclude the frontline resolution stage within 10 working days from the date of receipt by resolving the complaint or escalating it to the investigation stage.

Day 10:

Frontline resolution achieved or complaint escalated to the investigation stage.

Transferring cases from frontline resolution to investigation

If it is clear that frontline resolution has not resolved the matter, and the client wants to escalate the complaint to the investigation stage, you must pass the case for investigation without delay. In practice this will mean the same day that the client is told it will happen.

Timelines at investigation

You may consider a complaint at the investigation stage:

- after attempted frontline resolution, or
- immediately on receipt if you believe the matter to be sufficiently complex, serious or appropriate to merit a full investigation from the outset.

Acknowledgement

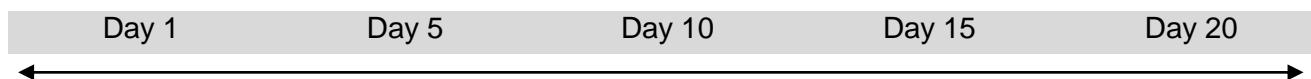
Within **three working days** of receipt, you must acknowledge all complaints that reach the investigation stage. The date of receipt is:

- the day the case is transferred from the frontline stage to the investigation stage, where it is clear that the case requires investigation, or
- the day the client asks for an investigation after a decision at the frontline resolution stage. You should note that a client may not ask for an investigation immediately after attempts at frontline resolution, or
- the date you receive the complaint, if you think it sufficiently complex, serious or appropriate to merit a full investigation from the outset.

Investigation

You should respond in full to the complaint within **20 working days** of receiving it at the investigation stage.

The 20-working day limit allows time for a thorough, proportionate and consistent investigation to arrive at a decision that is objective, evidence-based and fair. This means you have 20 working days to investigate the complaint, regardless of any time taken to consider it at the frontline resolution stage.



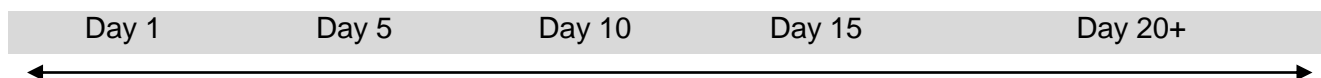
Day 1:

Day you receive the complaint at the investigation stage, or the next working day if the date of receipt is a non-working day. Issue an acknowledgement to the client within 3 working days.

Day 20:

Issue our decision to the customer or reach agreement with the customer to extend the deadline.

Exceptionally you may need longer than the 20-day limit for a full response. If so, you must explain the reasons to the client, and agree with them a revised timescale.



Day 1:

Day we receive the complaint at the investigation stage, or the next working day if the date of receipt is a non-working day. Issue an acknowledgement to the client within 3 working days.

By Day 20:

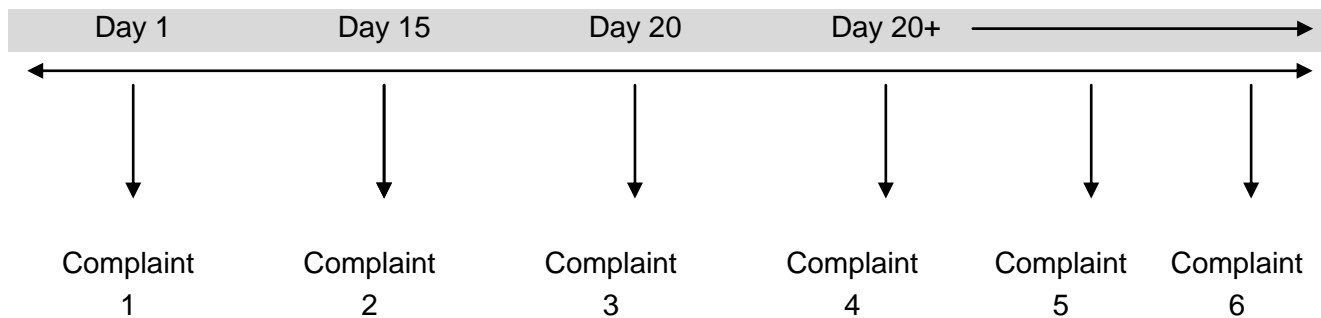
In agreement with the client where possible, decide a revised timescale for concluding the investigation.

By agreed date:

Issue our final decision on the complaint

Timeline examples

The following examples show when we conclude our consideration of a complaint, setting out the different stages and times when we may resolve a complaint.



Each complaint's circumstances are explained below:

Complaint 1

This is a straightforward issue that we can resolve by an on-the-spot explanation and, where appropriate, an apology. We can resolve such a complaint on day 1.

Complaint 2

This is also a straightforward matter requiring little or no investigation. In this example, we can reach resolution at day three of the frontline resolution stage.

Complaint 3

We considered this complaint appropriate for frontline resolution. We did not resolve it in the required timeline of five working days. However, we authorised an extension on a clear and demonstrable expectation that the complaint would be satisfactorily resolved within a further five days. We resolved the complaint at the frontline resolution stage in a total of eight days.

Complaint 4

This complaint was suitably complex or serious enough to pass to the investigation stage from the outset. We did not try frontline resolution; rather we investigated the case immediately. We issued a final decision to the client within the 20-day limit.

Complaint 5

We considered this at the frontline resolution stage, after authorising a five-day extension. At the end of the frontline stage the client was still dissatisfied. At their request, we conducted an investigation and issued our final response within 20 working days. Although the total timeline was 30 working days, we still met the combined time targets for frontline resolution and investigation.

Complaint 6

We considered this complaint at both the frontline resolution stage and the investigation stage. We did not complete the investigation within the 20-day limit, so we agreed a revised timescale with the client for concluding it beyond the 20-day limit.
