



Seeing red

Tom Kelly explains that customer complaints must be taken seriously and used to improve service delivery.

FURTHER INFORMATION

Scottish Public Sector Ombudsman's statement of complaints handling principles: www.lexisurl.com/spsoprocess

TEN SECOND SUMMARY

- 1 **Advisers should demonstrate that complaints are being taken seriously.**
- 2 **The importance of a principles-based complaints procedure.**
- 3 **Do customers know that they are important to the success of a business?**

No matter how hard we try to please customers, some of them will "see red" and find cause to complain at some point. The trick is to acknowledge the complaint and turn it into a positive by not only addressing the issues raised, but using these to improve service delivery. A quick fix that leads to a further service issue down the line is not the answer; a business needs to demonstrate that complaints are taken seriously and that there is an established and controlled process for dealing with them and that improving service delivery is key.

Complaints policy

That process will differ between organisations but the basic principles should remain the same. A good guide can be found in the policies of public sector bodies; although aimed at larger organisations, they are useful in setting out the approach to be taken. In my own part of the country (and this is not to be taken as evidence of my side on the independence issue) a good example of the principles to be applied can be found in the Scottish Public Sector Ombudsman's (SPSO) statement of complaints handling principles. To be effective, these say that the complaints process should have the following attributes.

- **User-focused.** The needs of different service users should be recognised and the process made flexible and responsive to meet them. Complaints need to be properly identified (what constitutes a complaint?), treated respectfully, given support to bring out the main issues, and maintain confidentiality.
- **Accessibility.** The complaints policy and procedure need to be well publicised and available to all. For example; they should be included on the website, be available at reception or customer services and referenced in marketing and promotional material. The needs of minority and vulnerable groups should be recognised as well as any support provided to help deal with their complaints.

- **Simple and timely.** The process should have as few steps as possible and agreed timelines should be attached. Investigation of the complaint should not, however, be restricted by set timelines where these are deemed to be inappropriate, for example in complex cases. However, such cases should be the exception and the complainant should be made aware of the circumstances of any delays.
- **Thoroughness.** The process needs to be thorough but also proportionate to the issues raised and consistent in the way these are addressed. Quality standards (policy, procedures, timelines) should be applied and quality assurance should be included in the process, such as a review of the outcomes and supporting evidence by another senior officer even if only on a sample basis when signing off the case.
- **Objective – impartial and fair.** Staff who are the subject of the complaint or were involved in the service that is the subject of it, should not be handling the complaint itself. This may be difficult to achieve in a small organisation. If so, it is important to demonstrate that recognised complaint handling standards are being adhered to, such as those of a professional body, public sector body or trade organisation. The investigation should be driven by the available evidence and not by assumptions.
- **Speedy.** Complaints should be resolved at the earliest opportunity and to the satisfaction of the complainant unless this is not appropriate in the circumstances. The outcome should not only satisfy the complainant, but also deliver an improvement in service and not compromise the services to other customers. Staff should be trained to resolve complaints early and quickly.
- **Delivering improvement.** Complaints and how they are resolved provide important data to be reviewed and can be used to improve the service delivery process. They can be a useful measure of performance and a means to identify recurring problems and trends. Making this information available to customers and staff demonstrates that the organisation is responsive to their needs and concerns.



Complaints procedure

There should be a detailed procedure backing up the above principles. This should set out the process in terms of: how a complaint should be made (letter, written complaint form, email, online form); who will investigate it; the targets set for responding; and how the outcome will be communicated to staff and the complainant.

The SPSO model complaints handling procedure, which supports that organisation's statement of complaints handling principles, sets out the process in a handy diagram format. This lists three stages in the process: frontline resolution; investigation; and independent external review – for our readers, this would be the IFA.

Resolution, investigation and review

Where the issues raised are straightforward and can be resolved with little or no investigation, these are considered to be "frontline". Such issues can usually be resolved by any staff member, say within five working days, and the complainant advised accordingly. Nevertheless, the details and outcome of the complaint still need to be recorded and any areas for improvement noted. Examples are a service that has not been provided, or not provided to the agreed standard, or where a member of staff has been said to be rude or unhelpful.

Issues that cannot be resolved at the frontline will need to be investigated and the complainant advised of this. The SPSO sets a target timescale of three working days for the acknowledgement and 20 days for a full response. These timescales are for guidance only, but anything widely in excess of this would seem inappropriate unless there are exceptional circumstances. Complex cases may take longer and, if so, the complainant should be kept in the loop as the investigation progresses and a central point of contact (staff member, contact details) provided. Examples are where frontline action did not satisfy the complainant, where the issues are complex and

require more detailed review, or are serious or high-risk/profile ones.

Where an important and/or high-profile or high-risk issue has proved impossible to resolve satisfactorily an independent mediator (see "Building bridges", this issue page 18) could try to address the issues and bring both parties to an agreed solution. This could be, for example, an independent external consultant.

Recording of complaints

The record of the complaint and its outcome should be kept simple: dates; complaint details; complainant; areas of operation affected; staff members carrying out the investigation; outcome; action taken; and recommendations for delivering improvement. The records should allow for data to be extracted and reported on.

A complaints policy and procedure are likely to be related and linked to other governance policies, such as a staff code of conduct and other human resources policies. There must be consistency and a corporate fit between these related policies. Individual staff may also be required to comply with codes of practice and standards of service of their own professional bodies, which will have their own guidance on making a complaint and their investigation process. The same principles of complaints being identified, investigated, resolved and lessons learned for future improvement will be applied.

The IFA, of course, has its own bylaws, regulations standards and guidance, including "how to make a complaint". It also has its own disciplinary procedure, which includes what falls under these procedures and timescales set for advising and responding.

Reporting on complaints

Finally, the important issues raised in complaints and the lessons learned need to be communicated and reported on to senior management as well as staff. These include monitoring the level of complaints and any trends emerging that point to deficiencies in service delivery.

The importance of a good complaint handling policy and process, even in a small organisation, cannot be over-emphasised. In my own experience, resolving issues at the frontline can be as simple as a partner, director or senior officer calling on the client at the outset and discussing their concerns. The firm may offer to provide one-off additional services free as a way of satisfying the client concerns. This can be a "win-win situation" if it helps to reduce the number of future complaints and encourage repeat business.

Good customers like to know that they are good customers and it is worth rolling out the red carpet for them on occasion. A business that fails to show its customers that they are valued risks losing them.

COMPLAINTS HANDLING

Principles

- User-focused
- Accessible
- Simple and timely
- Thorough
- Objective
- Quick to resolve concerns
- Delivering improvement

Frontline resolution

- Straightforward
- Easily resolved
- Require little/no investigation

Investigation

- Not resolved at the frontline
- Complex
- Serious
- High risk

Independent review

- Issues not resolved
- Disputed service failure
- Independent consultant/body



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