



SPSO Customer Service Complaints Procedure

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SPSO Customer Service Complaints Procedure

Foreword

Our Customer Service Complaints (CSC) Procedure reflects not only my personal commitment to valuing complaints, but also the organisational standards by which we will handle complaints. These are the same standards I expect bodies under our jurisdiction to apply when handling complaints they receive about their services. As an organisation that leads on good practice in complaints handling and sets the standard that others should follow, it is important that we take any complaints about our service very seriously. It is vital we all live up to the commitments we make as an organisation in our service standards and that we are all committed to improving our service where failures are identified.

Our procedure has been developed to comply with the standard approach to handling complaints across the public sector in Scotland, and is based upon our guidance on a model complaints handling procedure. This procedure aims to help us 'get it right first time', resolving complaints as quickly as possible and as close to the point of service delivery as possible by staff who are trained and empowered to resolve complaints. For complaints that can't be resolved quickly, it commits us to conducting thorough, impartial and fair investigations so that wherever possible we can identify and resolve service issues and prevent them from happening again.

Handled well, complaints about our service can give our customers a form of redress when things go wrong, and can also help us continuously improve our service. Complaints about our service provide a first-hand account of the customer's views and experience, and can highlight problems we may otherwise miss. Our aim is to address any areas where we have not delivered to the standards we or our customers expect of SPSO and this procedure commits us to providing a report of all complaints to the Leadership Team so that we can ensure we are learning from complaints and addressing any systemic issues that may be identified. The procedure also commits us to reporting performance information to our Audit and Advisory Committee and making it publicly available on a quarterly and annual basis to ensure we are open, transparent and held to account. In this way we can demonstrate to our customers, and others that we are a learning organisation.

It is the responsibility of all SPSO staff to resolve complaints where possible, saying sorry and putting things right when we have failed in our service. Handling complaints well will help us do our job better, improve the service provided to our customers and enhance public perception of the organisation.

Rosemary Agnew

Scottish Public Services Ombudsman

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How to use this CSC Handling Procedure

1. This document provides guidance to SPSO staff on how to handle customer service complaints about SPSO. A separate, customer-facing document provides information for customers on the CSC procedure. Together, these form our CSC handling procedure.
2. The procedure is designed to be used by all staff as an internal procedural document. It explains how to process, manage and reach decisions on customer service complaints.
3. When using this document, please also refer to the 'SPSO Statement of Complaints Handling Principles' and best practice guidance on complaints handling, which can be found on the Valuing Complaints website www.valuingcomplaints.org.uk.

SPSO Service Standards

4. Our service standards outline our commitment to providing a high-quality service to our customers and explain how they can expect us to act. [Appendix 1](#) sets out these standards, which explain our commitments to our customers about the level of service they should expect of SPSO. This includes communicating effectively, working in an open and fair way and carrying out our duties competently and responsibly. All staff should be aware of our service standards and understand how these apply in our day to day work.
5. These standards are used when considering customer service complaints to assess the service we have provided, and whether we have failed to meet our commitment to our customers.

SPSO Complaints and Investigations Guidance

6. This guidance should also be cross-referenced with our process and [the Complaints and Investigations Guidance](#) that has been produced to ensure consistency of approach to complaints handling across SPSO.

What is a customer service complaint?

7. Our definition of a customer service complaint is:

'An expression of dissatisfaction by one or more individuals (including bodies under SPSO's jurisdiction) about the SPSO's action or lack of action in relation to our service or about the standard of service provided by or on behalf of the SPSO.'

8. A complaint about customer service may relate to:

- failure to provide a service the customer is entitled to
- inadequate standard of service or failure to meet any aspect of our service standards
- unreasonable delay, including failure to meet our stated targets without good reason or keeping complainants informed of progress
- treatment by, or attitude of, a member of staff, including where a customer feels we have not treated them politely, professionally or with dignity and respect
- failure to communicate appropriately with customers, for example a failure to explain things clearly (including our decisions provide accurate information or to keep the customer updated regularly)
- failure to meet the needs of customers, for example, failure to consider requests for information in different formats or languages or other special requirements. This would include failure to make appropriate reasonable adjustments
- failure to meet our service commitments to customers. This would include, for example, a failure to listen to what the customer wants from us and ensure we understand their complaint
- dissatisfaction with SPSO policy.

9. This list does not cover everything and [Appendix 2](#) provides a range of examples of complaints about our service and how these may be handled.

10. There are some things which are not covered by this procedure. You must not treat these issues as service complaints, rather you should ensure that customers are directed to use the appropriate procedures.

11. A complaint about our service is **not**:

- disagreement or dissatisfaction with our decision on a complaint or the basis for that decision (this should be considered through the request for review process within the criteria for that process)
- a complaint about the evidence or advice we have taken into account, including our interpretation of that evidence or advice (this should be considered through the request for review process within the criteria for that process)

- a request for information (which should be referred to the Data protection and FOI Officer for response through the relevant DPA or FOI(S)A process)
 - a routine first-time request for a service, for example where a customer is unhappy that we do not have information in a particular language or format but has not previously requested this
 - a complaint that relates to the actions of another body, for example complaints about bodies under the SPSO's jurisdiction or complaints about the Scottish Parliamentary Corporate Body, including complaints about the SPSO legislation
 - an attempt to reopen a previously concluded service complaint or to have a service complaint reconsidered where we have already given our final decision
12. [Appendix 3](#) gives more examples of 'what is not a service complaint' and how to direct customers appropriately.
13. There may, of course, be occasions where a customer expresses dissatisfaction about matters which relate to both the service they received and to the decision that has been made on their complaint. It can sometimes be difficult to differentiate between service complaints and requests to review a decision. Where this occurs, care should be given to identifying clearly those issues that can be handled as service complaints and those that should be considered through the decision review process. Where appropriate you should discuss the case with the Executive Casework Officer and/or the Head of Improvement, Standards and Engagement (ISE).

Who can make a CSC?

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

How can a customer complain?

15. A customer can make a CSC in writing, in person, by telephone, by email or online, or by having someone complain on their behalf. It is important to note that there is no requirement to make CSCs in writing. You must always consider frontline resolution, regardless of how you have received the customer's CSC.

What if the customer does not want to complain?

16. If a customer has expressed dissatisfaction in line with our definition of a CSC but does not want to complain, tell them that we do consider all expressions of dissatisfaction, and that complaints offer us the opportunity to improve services where things have gone wrong. If, however, the customer insists they do not wish to complain, record the issue as an anonymous CSC. This will still allow us to fully consider the matter and resolve any service issues where appropriate.

Handling anonymous CSCs

17. We value all complaints about our service. This means we treat all CSCs, including anonymous complaints, seriously and will take action to consider them further, wherever this is appropriate. Generally, we will consider anonymous CSCs if there is enough information to allow us to make further enquiries. If, however, an anonymous CSC does not provide

enough information to enable us to take further action, we may decide not to pursue it further. Any decision not to pursue an anonymous CSC must be authorised by the Head of ISE and recorded on Workpro. Further guidance will be provide at that stage on how to record the complaint on Workpro.

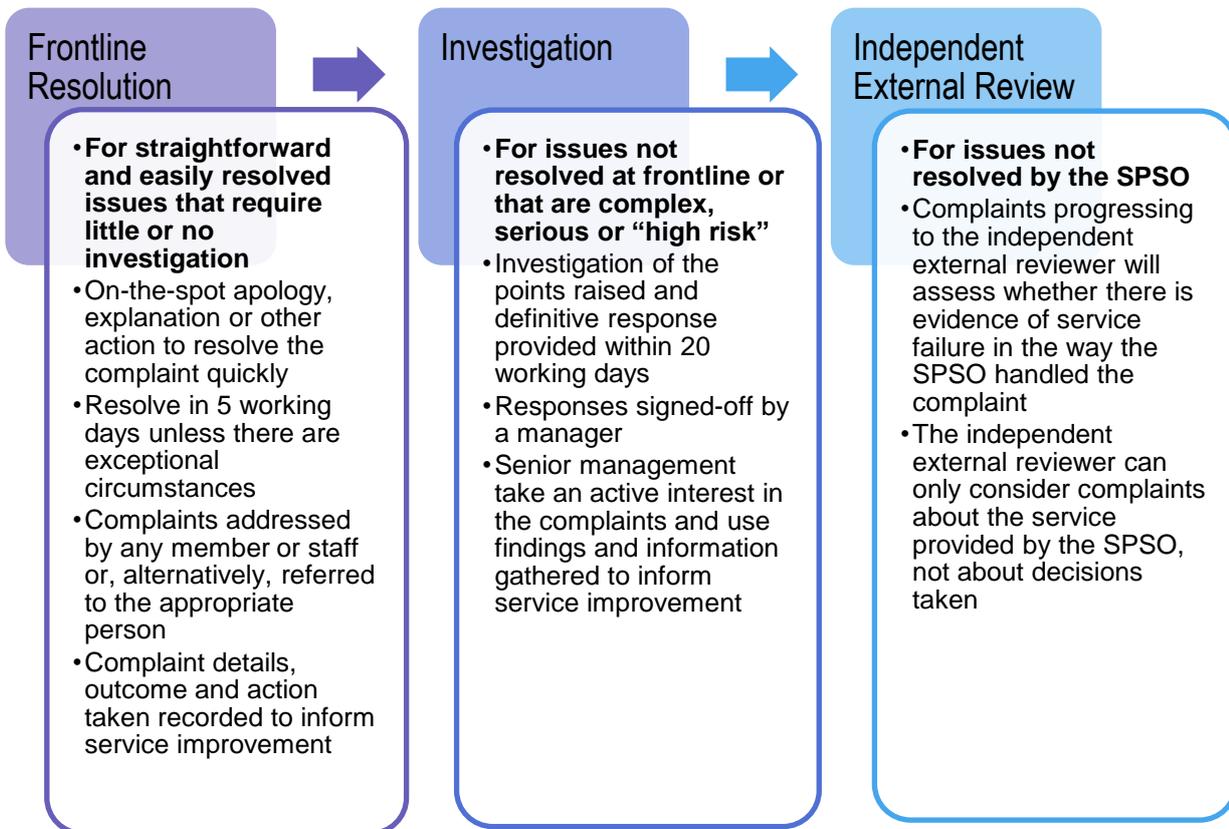
18. If an anonymous CSC makes serious allegations, this must be referred immediately to the Head of ISE.

Complaints involving more than one team

19. If a complaint relates to the actions of two or more teams, or actions we have taken at different parts of our process, we must tell the customer 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 customer complains to us about the service of another agency or public service provider, but we have no involvement in the issue, the customer should be advised to contact the appropriate organisation directly.

The Customer Service Complaints Process

20. We have a quick, simple and streamlined process for resolving CSCs early. This process is outlined below, and in our public-facing leaflet. We also have a CSC form for users which should be provided on request.
21. Our CSC process provides two opportunities to resolve CSCs internally:
 - 21.1. frontline resolution, and
 - 21.2. investigation.
22. Followed by an opportunity for an independent external review.



Stage one: Frontline Resolution

23. Frontline resolution aims to quickly resolve straightforward service complaints that require little or no investigation. Any member of staff at any level and in any team may deal with straightforward service complaints at this stage.
24. The main principle is to seek early resolution, resolving CSCs at the earliest opportunity and as close to the point of service delivery as possible. This may mean by telephone call or face-to-face discussion with the customer, or asking an appropriate member of staff to deal directly with the CSC.
25. [Appendix 2](#) gives examples of the types of CSC we may consider at this stage, with suggestions on how to resolve them.

26. In practice, frontline resolution means resolving the CSC at the first point of contact with the customer, either by the member of staff receiving the CSC or other appropriate member of staff, which will often be the CR responsible for the case.
27. In either case, you may resolve the CSC by providing an on-the-spot apology where appropriate, or explaining why the issue occurred and, where possible, what will be done to stop this happening again. You may also explain that, as an organisation that values complaints, SPSO may use the information given when we review service standards in the future.

What to do when you receive a CSC

28. On receiving a CSC, you must first decide whether the issue can indeed be defined as a CSC. The customer may express dissatisfaction about more than one issue. This may mean you treat one element as a CSC, while directing the customer to pursue another element through an alternative route (see [Appendix 3](#)).
29. If you have received and identified a CSC, record the details on Workpro.
30. Next, decide whether or not the CSC is suitable for frontline resolution. Some CSCs will need to be fully investigated before you can give the customer a suitable response. You must escalate these CSCs immediately to the investigation stage.
31. Where you think frontline resolution is appropriate, you must consider five key questions, whatever the method of contact; phone, meeting, email or letter:
 1. What exactly is the customer's CSC (or complaints)?
 2. What does the customer want to achieve by complaining?
 3. Can I achieve this, or explain why not?
 4. If I cannot resolve this, who can help with frontline resolution?
 5. Who else do I need to speak to in the SPSO?

1. What exactly is the customer's CSC (or complaints)?

It is important to be clear about exactly what the complaint is and what the issues are. You may need to ask the customer for more information and probe further to get a full picture.

2. What does the customer want to achieve by complaining?

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

3. 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 appropriate, you should follow our published guidance on the subject.

The customer may expect more than we can provide. If so, you must tell them as soon as possible. An example would be where the customer is so dissatisfied with our service that they demand that the Ombudsman be replaced.

You are likely to have to convey the decision on the telephone or face to face. If you do so face to face, by telephone or by email, you are not required to write to the customer as well, although you may choose to do so. It is important, however, to keep a full and accurate record of the decision reached and passed to the customer.

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

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

5. Who else do I need to speak with in the SPSO and at what point?

There are two broad reasons you may need to speak with colleagues:

1. You may be the point of contact for the CSC, but did not have a part in the delivery of the service. Do you need to speak to the staff who were?

You should inform the staff member concerned that you are handling the CSC, and give them an opportunity to comment. If this not possible, for example, if you are on the phone to someone and the issue and action are clear you may be able to, or need to give an immediate response, inform them about the CSC as soon as possible afterwards.

2. You may need to get advice to be able to respond to the CSC.

In either case, it is important to respond to the customer within **five** working days, either resolving the matter or explaining that their CSC is to be investigated.

Timelines

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

Extension to the timeline

33. 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 customer. This must only happen when an extension will make it more likely that the CSC will be resolved at the frontline resolution stage.
34. When you ask for an extension, you must get authorisation from your manager, who will decide whether you need one to resolve the CSC effectively. An example of when this may

be appropriate includes the customer, staff or advisers being temporarily unavailable where this would cause a barrier to the resolution of or response to the complaint. If, however, the issues are so complex that they cannot be resolved in five days, it may be more appropriate to escalate the CSC straight to the investigation stage. You must tell the customer about the reasons for the delay, and when they can expect your response.

35. If the customer does not agree to an extension but it is unavoidable and reasonable, your manager must decide on the extension. You must then tell the customer about the delay and explain the reason for the decision to grant the extension.
36. It is important that such extensions do not become the norm. Rather, the timeline at the frontline resolution stage should be extended only rarely. All attempts to resolve the CSC at this stage must take no longer than **ten working days** from the date you receive the CSC. If you have not closed a 'frontline resolution' customer service complaint by 10 working days, you must escalate it to the investigation stage of this procedure.
37. The proportion of CSCs that exceed the five-day limit will be evident from reported statistics. These statistics go to the Leadership Team and are published on our website quarterly.
38. [Appendix 4](#) provides further information on timelines.

Closing the CSC at the frontline resolution stage

39. When you have informed the customer of the outcome, you are not obliged to write to them, although you may choose to do so. You must ensure that our response to the CSC addresses all areas that we are responsible for and explains the reasons for our decision. You must also tell the customer that they may ask for the complaint to be investigated at the next stage of the procedure if they are unhappy with the decision at the frontline resolution stage. It is also important to record on Workpro a full and accurate record of the decision reached and given to the customer. The CSC should then be closed and Workpro updated accordingly.

When to escalate to the investigation stage

40. A CSC must be escalated to the investigation stage when:
 - 40.1. frontline resolution was tried but the customer remains dissatisfied and requests an investigation into the CSC. This may be immediately on communicating the decision at the frontline stage or could be some time later
 - 40.2. the customer refuses to take part in the frontline resolution process
 - 40.3. it has not been possible to resolve the complaint at the frontline resolution stage within 10 working days
 - 40.4. you determine that the issues raised are complex and require detailed investigation
 - 40.5. the CSC relates to serious, high-risk or high-profile issues.
41. When a previously closed CSC is escalated from the frontline resolution stage, this is not a new complaint but the case should be reopened on Workpro.
42. Take particular care to identify CSCs that might be considered serious, high risk or high profile, as these may require particular action or raise critical issues that need senior management's direct input. The consideration here relates specifically to the service we have provided, not to the nature of the complaint the customer has asked us to consider

about a body under jurisdiction. We define potential high-risk or high-profile CSCs as those that may:

- 42.1. involve a death or terminal illness, exacerbated by poor service delivery
- 42.2. involve serious service failure, for example major avoidable delays in providing, or repeated failures to provide, a service
- 42.3. generate significant and ongoing press interest in respect of the service we provided
- 42.4. pose a serious risk to SPSO's operations
- 42.5. present issues of a highly sensitive nature, for example concerning:
- 42.6. immediate homelessness
- 42.7. a particularly vulnerable person

Stage two: Investigation

- 43. Not all CSCs are suitable for frontline resolution and not all CSCs will be satisfactorily resolved at that stage. CSCs handled at the investigation stage of the procedure are typically complex or require a detailed examination before we can state our position. These CSCs may already have been considered at the frontline resolution stage, or they may have been identified from the start as needing immediate investigation.
- 44. An investigation aims to establish all the facts relevant to the points made in the CSC and to give the customer a full, objective and proportionate response that represents our final position.

What to do when you receive a CSC for investigation

- 45. The investigation stage is dealt with by the manager of the team involved. Where there is more than one team involved, we must tell the customer who will take the lead in dealing with the complaint, and explain that they will get only one response covering all issues raised. Service complaints that are considered to be particularly complex, present a significant risk to SPSO or are about the personal conduct of a manager should be brought to the attention of the Head of ISE. They have discretion to decide whether to investigate the complaint personally.
- 46. It is important that the investigating officer is clear from the start of the investigation stage exactly what is being investigated, and to ensure that both they and the customer understand the investigation's scope.
- 47. It may be helpful to discuss and confirm these points with the customer at the outset, to establish why they are dissatisfied and whether the outcome they are looking for sounds realistic. In discussing the CSC with the customer, three key questions should be considered:
 - 47.1. What specifically is the customer's CSC or complaints?
 - 47.2. What does the customer want to achieve by complaining?
 - 47.3. Are the customer's expectations realistic and achievable?
- 48. It may be that the customer expects more than we can provide. If so, this must be made clear to the customer as soon as possible.

49. Where possible any additional information required to investigate the complaint should be highlighted. The customer may need to provide more evidence to help us reach a decision.
50. The investigating officer should inform the staff involved in the delivery of the service being complained about that a CSC is being investigated at stage 2, giving them the opportunity to comment or provide information. There may be occasions where this is not appropriate, for example (but not exclusively):
 - 50.1. the nature of the complaint is particularly sensitive
 - 50.2. a staff member is unavailable and waiting would result in unreasonable and unnecessary delay for the customer (whether or not it would also need an extension of timescales)
 - 50.3. there are questions about the legality of our actions (e.g. compliance with Equality legislation)
 - 50.4. informing the member of staff would be disproportionately upsetting for them at this point
 - 50.5. there is a health and safety implication.
51. The investigating officer (or the team assistant on behalf of the investigating officer) must ensure that the relevant details are recorded on Workpro on receipt of the complaint at the investigation stage.
52. Where the complaint is escalated from frontline resolution to investigation, the same case reference number must be used and escalated from stage 1 to stage 2.
53. If the investigation stage follows attempted frontline resolution, the person who dealt with frontline resolution must ensure that Workpro accurately holds a record of all the service-related case notes and associated information. This will allow the relevant manager / Head of ISE to proceed with a full understanding of events at the investigation stage.

Timelines

54. The following deadlines apply to cases at the investigation stage:
 - 54.1. CSCs must be acknowledged within **three working days**
 - 54.2. a full response to the CSC must be provided as soon as possible but no later than **20 working days** from the time the CSC was received for investigation, unless an extension is required.

Acknowledgements

55. Acknowledgements should include:
 - 55.1. contact details of the person dealing with the complaint at investigation stage
 - 55.2. a statement confirming that the complaint will normally be investigated, and the response of the investigation sent to the customer within 20 working days or as soon as reasonably practicable
 - 55.3. a statement advising that if it will not be possible to send a response within 20 working days, the customer will be provided with an explanation as to why there is a delay and, provided with a revised timetable for the investigation.

56. The acknowledgement letter should be issued in keeping with the customer's preferred method for communication and in a format that is accessible to the person making the complaint. You should also consider including the following points, where relevant to the complaint:
- 56.1. thank the person making the complaint for raising the matter;
 - 56.2. summarise your understanding of the complaint made and what the person making the complaint wants as an outcome (this information will be available to you from your actions at 'What to do when you receive a CSC for investigation' as documented above);
 - 56.3. request that a consent form is completed where necessary;

Extension to the timeline

57. Not all investigations will be able to meet this deadline. For example, some CSCs are so complex that they require careful consideration and detailed investigation beyond the 20 working day limit. However, these would be the exception and you must always try to deliver a final response to a CSC within 20 working days.
58. If there are clear and justifiable reasons for extending the timescale, the investigation officer should ask the Head of ISE to set time limits on any extended investigation, as long as the customer agrees. The customer must be kept updated on the reason for the delay and given a revised timescale for completion. If the customer does not agree to an extension but it is unavoidable and reasonable, then the Head of ISE must consider and confirm the extension. The reasons for an extension might include the following:
- 58.1. Essential accounts or statements, crucial to establishing the circumstances of the case, are needed from staff, advisers or others but they cannot help because of long-term leave or sickness.
 - 58.2. You cannot obtain further essential information within normal timescales.
 - 58.3. Operations are disrupted by unforeseen or unavoidable operational circumstances.
59. These are only a few examples, and you must judge the matter in relation to each CSC. However, an extension would be the exception and you must always try to deliver a final response to the CSC within 20 working days.
60. As with CSCs considered at the frontline stage, the proportion of CSCs that exceed the 20 working day limit will be evident from statistics reported to the Leadership Team. These statistics must go to the Leadership Team on a quarterly basis.
61. **Appendix 3** provides further information on timelines.

Closing the CSC at the investigation stage

62. The outcome of the investigation, including any learning, should be fed back to staff members who have been named in the complaint. Wherever possible they should be given the opportunity to comment on the decision, particularly in relation to factual accuracy, before it is communicated to the complainant. This puts an onus on the person handling the complaint to allow the staff member reasonable time to respond, and on the staff member to respond as soon as possible.

63. If this is not possible for similar reasons to paragraph 50, the outcome should be discussed with the member of staff as soon as possible after the complaint has been closed. While it is not desirable to extend timescales simply to ensure a staff member has seen the draft response, a balance should be struck between good service in CSC handling and fairness to the staff member, particularly if the complaint is being upheld.
64. The outcome of the investigation must be given to the customer in writing and by their preferred method of contact. Our response to the CSC must address all areas that we are responsible for and explain the reasons for our decision. The response must also include the conclusions of the investigation and information about any remedial action taken or proposed as a consequence of the complaint. The quality of the response is very important and in terms of best practice should:
 - 64.1. be clear and easy to understand, written in a way that is person-centred and non-confrontational;
 - 64.2. avoid technical terms, but where these must be used to describe a situation, events or condition, an explanation of the term should be provided;
 - 64.3. address all the issues raised and demonstrate that each element has been fully and fairly investigated;
 - 64.4. include an apology where things have gone wrong;
 - 64.5. highlight any area of disagreement and explain why no further action can be taken;
 - 64.6. indicate that a named member of staff is available to clarify any aspect of the letter; and
 - 64.7. indicate that if they are not satisfied with the outcome, they may seek a review by the Independent Complaint Resolution Service (ICRS), as well as the time limit for taking their complaint to the ICRS, which is within one calendar month of receiving the decision, and the contacts details for the ICRS.
65. Once the decision has been issued to the customer, the investigating officer (or the team assistant on behalf of the investigating officer) must notify the Leadership Team and the Executive Casework Officers of the decision by providing a link to the relevant document in Workpro, highlighting any learning points that require wider discussion or policy changes.
66. The investigating officer (or the team assistant on behalf of the investigating officer) must complete all fields in Workpro relevant to the investigation stage and ensure that there is an accurate record of all the service related case notes and associated information. Where the decision includes a commitment to taking further action, or a recommendation from the ICRS, this must be recorded in the recommendations section of the customer complaints record.

Post decision correspondence with the person making the complaint

67. Once the customer has received the decision on their complaint, they may request a further explanation or clarification of the decision. This is not unreasonable, and in terms of providing good customer service you should do all you can to help the person understand the decision, and the basis for reaching the decision. You should make it clear, however, that your further actions are not a reinvestigation or reopening of the complaint, and if the customer simply disagrees with the decision made, they should be advised to approach the ICRS.

Independent Complaint Resolution Service (ICRS)

68. Once the investigation stage has been completed, the customer has the right to approach the ICRS within one month of receiving our decision letter if they remain dissatisfied.
69. The ICRS considers CSCs from people who remain dissatisfied at the conclusion of our CSC procedure. The ICRS will contact the customer within three days of their initial contact and will aim to reply in full to the CSC within 40 working days. The decisions the ICRS makes on individual CSCs are independent of SPSO.

Governance of the CSCs Handling Procedure

Roles and responsibilities

70. Overall responsibility and accountability for the management of CSCs lies with the Ombudsman and Leadership Team.
71. Our final position on CSCs considered at the investigation stage of this procedure must be signed off by the relevant manager, or the Head of ISE who will confirm that this is our final response.
72. **The Ombudsman:** The Ombudsman provides leadership and direction in ways that guide and enable us to perform effectively in the delivery of our services. This includes ensuring that there is an effective CSC handling procedure, with a robust investigation process that demonstrates how we learn from the CSCs we receive. The Ombudsman may take a personal interest in all or some CSCs, or may delegate responsibility to a manager. Management reports prepared for quarterly Leadership Team meetings assure the Ombudsman of the quality of complaints performance.
73. **The Director:** On the Ombudsman's behalf, the director may be responsible for:
 - 73.1. overseeing the implementation of actions required as a result of a CSC
 - 73.2. investigating CSCs, particularly where there may be a conflict of interest in the complaint being investigated by a manager or the Head of ISE.
74. **The Head of Improvement Standards and Engagement (ISE):** The Head of ISE has the operational lead for the investigation and management of CSC handling. As a senior officer, the Head of ISE is responsible and accountable for all CSCs. The Head of ISE may investigate CSCs that are considered to be serious, high risk or high profile, but has discretion to decide whether to investigate these CSCs personally or delegate the investigation to a relevant manager or appropriate staff member.
75. **SPSO managers:** SPSO managers will investigate CSCs that escalate from stage 1 of the procedure, or those CSCs that should be handled at stage 2 of the procedure immediately upon receipt. When investigating a CSC, the manager will assess the actions taken by the office against our service standards and commitments. The manager should investigate and decide on the outcome of the CSC and notify the customer of the outcome by sending a decision letter. The Leadership Team and the Executive Casework Officers must also be notified of the decision. Where appropriate details of any procedural changes in service delivery that could result in wider opportunities for learning across the SPSO should be identified.
76. **All SPSO Staff:** A CSC may be made to any member of staff in the SPSO. All staff must therefore be aware of the CSC handling procedure and how to handle and record CSCs at the frontline stage. They should feel confident in responding quickly and personally to expressions of dissatisfaction. They should also be aware of who to refer a CSC to, in case they are not able to personally handle the matter. We encourage all staff to try to resolve CSCs early, and quickly, as close to the point of service delivery as possible, to prevent escalation.

CSCs about senior staff and the Ombudsman

77. CSCs about senior staff (staff on the Leadership Team) can be challenging to handle, as there may be a conflict of interest for the staff investigating the CSC. When serious CSCs are raised against senior staff, it is particularly important that the investigation is conducted by an individual who is independent of the situation. Serious complaints include those types of complaints that pose significant operational, reputational, safety or financial risk to SPSO or its customers. Such CSCs must be immediately escalated to the Head of ISE and depending on the seriousness of the complaint in their view, to the Ombudsman. We must ensure we have strong governance arrangements in place that set out clear procedures for handling such CSCs.
78. Generally, it will be acceptable for the Ombudsman to investigate a CSC about a member of the Leadership Team where there is a segregation of duties and clearly no conflict of interest. This would include where the investigation officer has had no involvement in the matter complained about. In such instances, the Ombudsman should be consulted on the response to the complaint and make the final decision on the complaint based on the evidence identified by the investigation.
79. In relation to CSCs about the Ombudsman, a judgement needs to be made about whether the complaint relates to specific conduct or action by the Ombudsman or whether it relates to actions taken by the Ombudsman's staff in their name (i.e. about the organisation). Where the complaint specifically relates to the conduct, behaviours or actions by the Ombudsman, the Head of ISE will assess the merits of the case and decide if the complaint should be referred immediately to the ICRS, or considered initially by a member of the Leadership Team. The ICRS will consider complaints about the Ombudsman's conduct, behaviours or actions when referred by SPSO.

Conflict of interest

80. A complaint about service may suggest there has been bias shown against the customer in favour of the body under jurisdiction (or vice versa), or there has in some way been a conflict of interest that has affected the service provided. As a general principle, we do not normally allow members of staff to work on any complaints about a body in which they worked (or with which they worked very closely) in the four years before taking up their position with SPSO.
81. The SPSO Register of Interests Policy defines potential conflicts of interest as arising 'when staff members enter into any official, professional or personal relationships which may, or could reasonably be perceived to, cause them inappropriately or unjustifiably to limit the scope, extent or rigour of their work or impair the objectivity of their judgement'. We also take the view that a potential conflict of interest may arise where an employee has previously worked with or knows, for other reasons, an individual involved in making or handling a complaint that is brought to SPSO. A conflict of interest can relate to past and present associations and there may be further reasons why a conflict of interest may arise therefore all staff investigating Customer Service Complaints should be aware of this. Where a conflict of interest is alleged, the investigating officer should have regard to the requirements of our Register of Interests Policy.

Disciplinary Matters

82. CSCs may include allegations of a serious nature claiming misconduct on the part of SPSO employees. It is important where a complaint about service has been raised, it is addressed

and responded to through the CSC process; however it may be appropriate to also consider any disciplinary matters under relevant alternative SPSO HR procedures. Advice should be sought from the Director or HR officer on a case-by-case basis with regard to current SPSO HR policies and procedures.

Recording, reporting, learning and publishing

83. CSCs provide valuable customer feedback. One of the aims of the CSC handling procedure is to identify opportunities to improve services across the SPSO. We must record all CSCs in a consistent way on Workpro so that we can use CSC data for analysis and management reporting. By recording and using CSCs information in this way, we can identify and address the causes of CSCs and, where appropriate, identify training opportunities and introduce service improvements. Guidance on logging CSCs on workpro is available [here](#).

Recording CSCs

84. To collect suitable data it is essential to record all CSCs as follows:
- 84.1. the customer's name and address
 - 84.2. the date the CSC was received
 - 84.3. the nature of the CSC
 - 84.4. how the CSC was received
 - 84.5. the service the CSC refers to
 - 84.6. the date the CSC was closed at the frontline resolution stage (where appropriate)
 - 84.7. the date the CSC was escalated to the investigation stage (where appropriate)
 - 84.8. action taken at the investigation stage (where appropriate)
 - 84.9. the date the CSC was closed at the investigation stage (where appropriate)
 - 84.10. the outcome of the CSC at each stage
 - 84.11. the underlying cause of the CSC and any remedial action taken.
85. We use Workpro for recording CSCs, their outcomes and any resulting action. These provide a detailed record of services that have failed to satisfy customers.

Reporting of CSCs

86. CSCs details are analysed for trend information to ensure we identify service failures and take appropriate action. Regularly reporting the analysis of CSCs information helps to inform the Leadership Team of where services need to improve.
87. We publish on a quarterly basis the outcome of CSCs and the actions we have taken in response. This demonstrates the improvements resulting from CSCs and shows that they can influence our services. It also helps ensure transparency in our CSC handling service and will help to demonstrate to our customers that we value their CSCs.
88. We must:
- 88.1. publish on a quarterly basis CSCs outcomes, trends and actions taken

- 88.2. use case studies and examples to demonstrate how CSCs have helped improve services.
- 89. This information should be reported regularly (and at least quarterly) to the Leadership Team.

Learning from CSCs

- 90. At the earliest opportunity after the closure of the CSC, the investigating officer should always make sure that the customer, and where appropriate the officer(s) concerned, are advised of the findings of the investigation and any recommendations made. If a service failure is identified, you should:
 - 90.1. apologise to the complainant
 - 90.2. identify the impact on the complainant and any action that can be taken to mitigate this
 - 90.3. assess if actions need to be taken to prevent a recurrence and plan how these should be achieved (any action taken should be followed up); and
 - 90.4. share any learning points.
- 91. The Leadership Team will review the information gathered from CSCs regularly and consider whether our services could be improved or internal policies and procedures updated.
- 92. As a minimum, we must:
 - 92.1. use CSCs data to identify the root cause of complaints
 - 92.2. take action to reduce the risk of recurrence
 - 92.3. record the details of corrective action in the complaint file, and
 - 92.4. systematically review CSCs performance reports to improve service delivery.
 - 92.5. Where we have identified the need for service improvement:
 - 92.6. the action needed to improve services must be authorised by the Head of ISE
 - 92.7. an officer (or team) should be designated the 'owner' of the issue, with responsibility for ensuring the action is taken
 - 92.8. a target date must be set for the action to be taken
 - 92.9. the designated individual must follow up to ensure that the action is taken within the agreed timescale
 - 92.10. where appropriate, performance in the service area should be monitored to ensure that the issue has been resolved
 - 92.11. we must ensure that SPSO staff learn from CSCs.

Publishing CSCs performance information

- 93. We also report on our performance in handling CSCs annually. This includes performance statistics showing the volumes and types of CSCs and key performance details, for example on the time taken and the stage at which CSCs were resolved.

Maintaining confidentiality

94. Confidentiality is important in complaints handling. It includes maintaining the customer's confidentiality and explaining to them the importance of confidentiality generally. We must always bear in mind legal requirements, for example, data protection legislation, as well as internal policies on confidentiality and the use of customers' information.
95. We should also be mindful of our duties towards staff. While our default position is that we will be open and transparent, there may be occasions where it is necessary to protect the identity of the staff member(s) involved.

Managing unacceptable behaviour

96. People may act out of character in times of trouble or distress. The circumstances leading to a CSC may result in the customer acting in an unacceptable way. Customers who have a history of challenging or inappropriate behaviour, or have difficulty expressing themselves, may still have a legitimate grievance.
97. A customer's reasons for complaining may contribute to the way in which they present their CSC. Regardless of this, we must treat all CSCs seriously and properly assess them. However, we also recognise that the actions of customers 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 Unacceptable Actions Policy to protect staff from unacceptable behaviour such as unreasonable persistence, threats or offensive behaviour from customers.
98. Where we decide to restrict access to a customer under the terms of the Unacceptable Actions Policy, we will communicate that decision, notify the customer of a right of appeal, and review any decision to restrict contact with us. This will allow the customer to demonstrate a more reasonable approach later.

Supporting the customer

99. All members of the community have the right to equal access to our CSC handling procedure. Customers who do not have English as a first language may need help with interpretation and translation services, and other customers may have specific needs that we will seek to address to ensure easy access to the CSCs handling procedure.
100. We must always take into account our commitment and responsibilities to equality. This includes making reasonable adjustments to our service to help the customer where appropriate.
101. Several support and advocacy groups are available to support customers in pursuing a CSC and customers should be signposted to these as appropriate.

Time limit for making CSCs

102. This CSC handling procedure sets a time limit of six months from when the customer first knew of the problem, within which time they may ask us to consider the CSC, unless there are special circumstances for considering CSCs beyond this time. A decision on whether to extend this timescale will be for the Head of ISE or other Leadership Team members where relevant.

Appendix 1: Customer Service Standards

SPSO Customer Service Standards: our commitments to you

We are committed to offering you a high-quality service. Our Customer Service Standards describe how you can expect us to act.

Commitment: We will communicate effectively with you

Respect and Dignity

- We will treat you with courtesy, respect and dignity.
- We will work with you without discrimination or prejudice.

Keeping you informed

- We will explain our investigation process to you.
- We will keep you informed of progress and tell you what needs to happen at each stage.
- We will always tell you who to contact if you have any questions.

Timeliness

- We will deal with your complaint in a timely manner, taking into account the complexity of the case.

Clarity

- We will be as accurate, plain and clear as we can in our communications.

Accessibility

- Our service will be easily available and accessible to you.
- We will work with you to meet your individual needs, including working with representatives to support you through our service.

Understanding

- We will listen to what you want from us and ensure we understand your complaint. If we cannot help you, we will direct you to an organisation who can.

Commitment: We will work in an open and fair way

Transparency

- We will publicise information about the Ombudsman, who is in charge of decisions on complaints.
- We will give you information about how we handle complaints.

Fairness

- We will consider all information provided to us before we reach a decision.
- Our decisions will be based on all of the relevant evidence.

Impartiality and independence

- We will make decisions on cases on the independent evaluation provided to us by all relevant parties alone.

Commitment: We will carry out our duties competently and responsibly

Expertise

- We guarantee that the Ombudsman (or the most senior officeholder in charge of your case) has the relevant skills and knowledge to make the decision on your complaint.

Explaining our scope

- We will clearly explain what we can look at, any restrictions that apply and what we can and cannot achieve.

Reaching sound outcomes

- We will clearly explain our reasons for our decisions.
- We will ensure remedies are proportionate, appropriate and fair.
- We will make sure remedies are put in place, as far as we can.

Ensuring impact

- We will use the outcomes of complaints and the learning from them to promote improvement and learning in the service and sector you complained about.

Handling information

- We will ensure our record-keeping is accurate, that we hold data securely and share it appropriately.

Putting things right

- We will acknowledge and apologise for any mistakes we make, put them right quickly and ensure lessons are learned to improve our service.

What we expect from you

We are committed to dealing with you in line with our Customer Service Standards. We also expect you to treat our staff and our service with respect. Our 'Unacceptable Actions Policy' explains how we deal with unacceptable actions against our staff and our process. This can be found on our website at www.spsso.org.uk/unacceptable-actions-policy

Are you happy with the service you received from us?

If something goes wrong or you are not satisfied with our service, please tell us. You have the right to complain if you feel we are not meeting our Customer Service Standards. We take complaints about our service very seriously and have a special procedure for dealing with them. You can get more information about how to complain from our website or by contacting us. Please ask for a copy of our complaints procedure and service complaints form.

www.spsso.org.uk/customer-service-standards

If you are happy with the service you received from us, please let us know. And we are always interested to hear suggestions on how we can improve our service.

www.spsso.org.uk/feedback

Your information

We are committed to protecting your privacy. We use information given to us about you and your complaint for its intended purpose and in line with the Data Protection Act 2018 and the SPSO Act 2002. We may need to collect and share information with a number of sources to carry out our investigation and we may do this orally, in hard copy or by email. We may report on the outcome of the investigation. When we do so we do not name individuals. We may also use information we collect to compile statistics and undertake research and analysis. There may be public interest benefits in reusing information for these purposes. Information is completely anonymised.

Your views are valuable to us, and we may contact you again to invite you to take part in our surveys for research purposes.

To find out more about how we handle your information and your rights, see our website. If you have any concerns about what we do, please let us know straight away.

How to contact the SPSO

Freepost SPSO (this is all you need to write on the envelope, and you don't need to use a stamp)

SPSO, Bridgeside House, 99 McDonald Road, Edinburgh, EH7 4NS

Opening hours: Monday, Wednesday, Thursday, Friday 9am–5pm, Tuesday 10am–5pm

Freephone: **0800 377 7330**

Website: www.spsso.org.uk

Online contact form www.spsso.org.uk/contact-form

You can fill in our complaints form online at www.spsso.org.uk/complain/form

Fax: **0800 377 7331**

Other languages and formats

Please contact us if you would like this leaflet in another language or format (such as large print, audio, BSL or Braille).

Appendix 2: CSC examples

The following tables give examples of CSCs that may be considered at the frontline stage, and suggest possible actions to achieve resolution.

CSC	Possible actions to achieve resolution
<p>The customer called the Assessment & Guidance team to say that they were very unhappy that every time they called the CR's direct line, they were put through to their voice mail. This had happened six times in the last fortnight.</p> <p>The customer said that this was causing them problems in discussing the complaint at a suitable time with the complaints reviewer.</p>	<p>Firstly, the call handler should apologise to the customer for the inconvenience this has caused them. This type of complaint should be handled at frontline resolution, i.e. within five working days.</p> <p>The call handler should thank the person for bringing this to our attention, log the complaint and email the appropriate CR, cc'ing the team manager, to raise the issue with them and request that they call the customer back. In the CR's absence the team manager should contact the customer with the frontline resolution response. They should also be thanked again for bringing the matter to our attention.</p> <p>It is important that the CR is reminded of the requirement to be available and accessible to customers when they call, and to make appropriate alternative arrangements if they are not available.</p> <p>If the customer cannot be contacted by phone, the response can be sent by letter or email. The complaint should then be closed with the outcome of the complaint record recorded on Workpro.</p>
<p>The customer sends an email to the CR to say she is deeply dissatisfied with the way her complaint has been dealt with. She states that she has been waiting for months for a decision on her complaint, and she considers this to be unacceptable.</p>	<p>The CR should contact the customer and explain that we understand her concerns regarding the time taken to provide a decision on the complaint. They should confirm that the case has been fully reviewed in response to her concerns, and while we are satisfied that we have provided regular and appropriate updates on our progress, we have identified a delay on our part in progressing the case. Explain the reason for the delay, in this case it was due to the need to seek additional clinical advice that should have been requested at an earlier point.</p> <p>Tell the customer that we now have all the information required to consider the complaint, and advise her of when she should expect to receive the decision. Thank her for raising her concerns with us, and apologise for the delay.</p>

CSC	Possible actions to achieve resolution
<p>On explaining the extent of our jurisdiction, and the need to consider evidence of maladministration and/or service failure in a particularly sensitive case, the customer became agitated and advised the CR that she did not think he was being helpful. She said it was hugely frustrating to keep getting her complaint 'knocked back' at every point, and she had expected better of SPSO. She asked that her complaint be reviewed by someone else.</p>	<p>Given the distressed state of the complainant, the CR should explain that we fully appreciate the sensitivities of the complaint and that if it would be helpful for the customer they could end the conversation at any time if she found it too difficult, and agree to continue the call at a later time at the customer's convenience.</p> <p>The CR should go on to explain that in light of her concerns, we have reviewed how her case has been handled, and that we have met our service standards commitments. The customer should be advised that if they remain unhappy with the service provided they can ask for their complaint to be investigated at the next stage of the complaints procedure.</p> <p>The service complaint, and decision should be recorded.</p>
<p>The customer complains that the CR has been rude in their telephone discussions, and that the CR had promised to call at an agreed time on three occasions, however on each occasion had failed to do so.</p>	<p>The CR should contact the customer to explain that they had never intended to be rude, and apologise that this has been the customer's experience. They should explain that a record is made on each occasion when the CR had discussed the complaint with him. On each of five occasions, the record was detailed and confirmed that all appropriate information had been communicated to the customer.</p> <p>Explain that the file also showed that on three occasions the CR had failed to get a response from the customer despite calling at the agreed times. They had also attempted to call at other times on the agreed date, without success. Confirm that on each occasion the CR had sent an email to the complainant to explain that they had been unable to contact them as agreed, and inviting the customer to contact them when it was suitable.</p> <p>Finally, explain to the customer that if they remain unhappy with this response, they can ask for their service complaint to be investigated at the next stage of the customer service complaints procedure.</p>

Appendix 3: What is **not** a CSC

1. A concern may not necessarily be a CSC. For example, a customer might make a routine first-time request for a service. This is not a CSC, but the issue may escalate into a CSC if it is not handled effectively and the customer has to keep on asking for service.
2. The following paragraphs provide examples of the types of issues or concerns that must not be handled through the CSC handling procedure. This is not a full list, and you should decide the best route for resolution based on the individual case.

Example 1: Request for information

3. The Freedom of Information Act (FOIA) gives people the right to access recorded information held by public sector organisations. Anyone can request this information. A customer may contact SPSO to express their dissatisfaction as they have not been able to source information from our web site. In asking for the information to be provided to them, the request should not be handled as a CSC, rather it should be dealt with as a request for information under FOIA.

Example 2: Request for Service

4. A customer contacts the SPSO to say that, given the sensitivities of her complaint she is unhappy that it has been allocated to a male member of staff to consider. She states that this is unacceptable and demands that her complaint be reallocated to a female member of staff. This should not be treated as a CSC, rather it is a first time request for service. It is possible, however, that such a request for service may escalate into a CSC depending on how the request has been handled.

Example 3: Request for service

5. Having contacted the customer by phone to agree the 'Heads of Complaint', the Complaints Reviewer then wrote to the customer to confirm their discussion. In response, the customer called the office explaining that they want to complain about the letter they have received. They state that they have a visual impairment and the letter is very difficult for them to read. They say that they are very unhappy with SPSO as a result.
6. On checking the initial complaints form and supporting documentation, there is no indication that the customer has a visual impairment. The customer's phone call is the first indication that SPSO has had of their visual impairment. Therefore, this is not a Customer Service Complaint, rather it is a request for service.
7. The Equality Act 2010 requires organisations to make 'reasonable adjustments' in relation to service delivery, where it is appropriate to do so. SPSO is committed to making reasonable adjustments as an integral requirement of our Customer Service provision. In this particular case, there are several ways in which our visually impaired customer may require the information we provide to be supplied. For example in a particular colour paper and font size (large print), emailed in Word format, in audio or Braille. A discussion with the customer will help to identify the adjustment required.

Example 4: Request for review

8. A customer contacts the SPSO to complain about the way the Complaints Reviewer has handled their complaint. They say that in reaching our decision, the Complaints Reviewer

relied on information provided by the body, and that information was false. They say they have documentation that verifies that the evidence provided by the body was unreliable and they say they are very unhappy with the Complaints Reviewer and want to complain.

9. Complainants (and bodies under jurisdiction) can ask us to review a decision on their case, and while the grounds on which they can request a review are limited, they do include circumstances where we have reached our decision taking account of evidence that is unreliable, and where the person asking for the review can demonstrate this. In this particular example, although the customer states they wish to complain about the way the Complaints Reviewer has handled the complaint, the basis of their complaint is in relation to the decision made, and the evidence used in reaching that decision. This is not a Customer Service Complaint, it is a request to review our decision and the matter should be handled through our review process.

Example 5: Request for review

10. On receiving the decision on their complaint, the customer writes to the Ombudsman to complain about the service received. They explain that before they received SPSO's decision, they requested documentation from the body, under the Freedom of Information Act, in relation to changes to the organisation's policy over a period of five years. This documentation shows that SPSO's decision was reached in considering the current policy, however, the policy appropriate at the time was different, and the customer provided a copy of the policy in support of their claim.
11. The body under jurisdiction failed to provide SPSO with the relevant policy documentation that was appropriate at the time of the complaint; instead the body provided the most up to date policy that was fundamentally different in that it contained a number of significant changes from the earlier policy.
12. The customer was therefore providing new and relevant information that was not previously available to the Complaints Reviewer, and which the customer claims, will affect the original decision made. This is not a Customer Service Complaint; it is a request for a review and should be handled through the review process.

Appendix 4: Timelines

General

References to timelines throughout the CSC handling procedure relate to working days. When measuring performance against the required timelines, we do not count non-working days, for example weekends, public holidays and days of industrial action where our service has been interrupted.

Timelines at frontline resolution

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



Day 1:

Day CSC received by the SPSO, or next working date if date of receipt is a non-working day.

Day 5:

Frontline resolution achieved or CSC escalated to the investigation stage.

The date of receipt will be determined by the SPSO's usual arrangements for receiving and dating of mail and other correspondence

Extension to the five-day timeline

If you have extended the timeline at the frontline resolution stage in line with the procedure, the revised timetable for the response must take no longer than 10 working days from the date of receiving the CSC.



Day 1:

Day CSC received by the SPSO, or next working date if 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 the CSC was received. You must conclude the frontline resolution stage within 10 working days from the date of receipt, either by resolving the CSC or by escalating it to the investigation stage.

Day 10:

Frontline resolution achieved or CSC 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 customer wants to escalate the CSC to the investigation stage, the case must be passed for investigation without delay. In practice this will mean on the same day that the customer is told this will happen.

Timelines at investigation

You may consider a CSC at the investigation stage either:

- 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

All CSCs considered at the investigation stage must be acknowledged within **three working days** of receipt. 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 customer asks for an investigation after a decision at the frontline resolution stage. You should note that a customer may not ask for an investigation immediately after attempts at frontline resolution, or
- the date you receive the CSC, 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 CSC within **20 working days** of receiving it at the investigation stage.

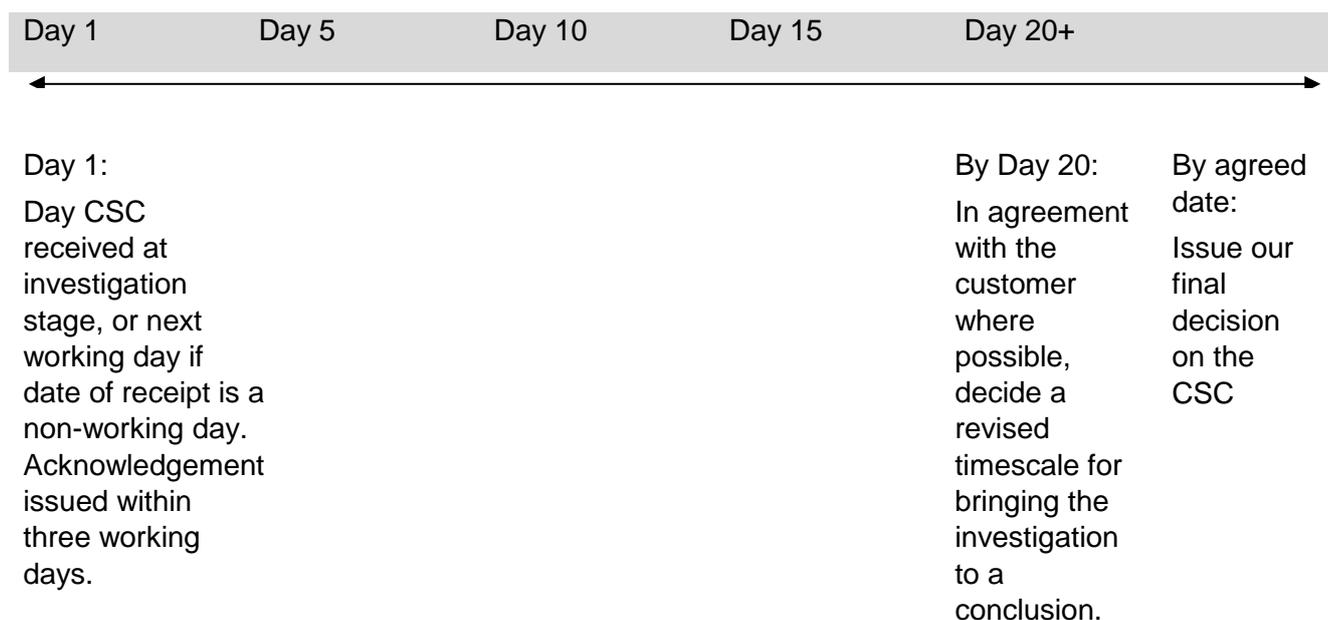
The 20-working day limit allows time for a thorough, proportionate and consistent investigation to arrive at a decision that is objective, evidence-based and fair. This means you have 20 working days to investigate the CSC, regardless of any time taken to consider it at the frontline resolution stage.



Day 1:
Day CSC received at investigation stage, or next working day if date of receipt is a non-working day. Acknowledgement issued within three working days.

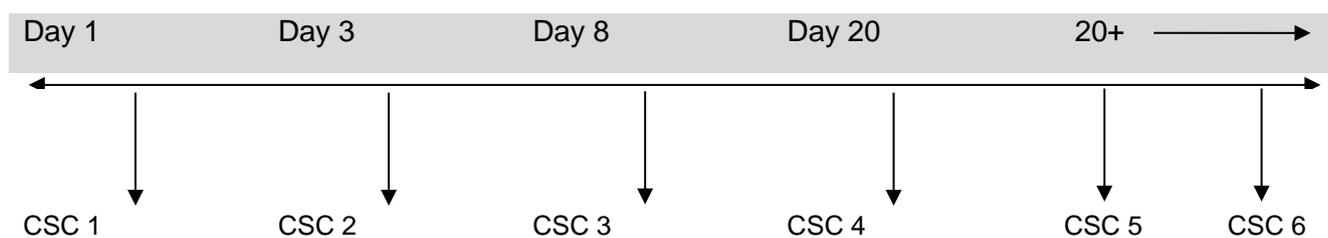
Day 20:
SPSO's decision issued to customer or agreement reached with customer to extend deadline

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



Timeline examples

The following illustration provides examples of the point at which we conclude our consideration of a CSC. It is intended to show the different stages and times at which a CSC may be resolved.



The circumstances of each CSC are explained below:

CSC 1 is a straightforward issue that may be resolved by an on-the-spot explanation and, where appropriate, an apology. Such a CSC can be resolved on day 1.

CSC 2 is also a straightforward matter requiring little or no investigation. In this example, resolution is reached at day three of the frontline resolution stage.

CSC 3 refers to a complaint that we considered 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 CSC would be satisfactorily resolved within a further five days. We resolved the CSC at the frontline resolution stage in a total of eight days.

CSC 4 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 customer within the 20-day limit.

CSC 5 we considered CSC 5 at the frontline resolution stage, where an extension of five days was authorised. At the end of the frontline stage the customer was still dissatisfied. At their request, we conducted an investigation and issued our final response within 20 working days. Although the

end-to-end timeline was 30 working days, we still met the time target for the escalated complaint (i.e. 20 working days).

CSC 6 was considered 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 customer for concluding the investigation beyond the 20-day limit.

Appendix 5: The CSC handling procedure

