



Complaints and Compliments Policy

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1. Introduction

- 1.1 Age UK Sutton (AUKS) recognises that providing a high standard of service delivery is essential. AUKS welcomes feedback from customers, whether it be positive or to tell us where we haven't met expectations. The proper handling of complaints is therefore one of Age UK Sutton's highest priorities. Staff members are trained to perceive complaints as a valuable source of information about services and processes and that handled in the correct manner can assist in continuous improvement.
- 1.2 To ensure that this policy meets the support needs across Age UK Sutton's diverse range of customers, it has been written in consideration of the Principles of Good Complaint Handling (Parliamentary And Health Service Ombudsman, 2009 (<https://ombudsman.org.uk/about-us/our-principles/principles-good-complaint-handling>))
- 1.3 Complaints and the complaints process are managed by the Services Director and CEO.

2. Aims & Objectives

2.1 Aims

- 2.1.1 To deliver a complaints service that meets Age UK Sutton's service standards
- 2.1.2 To facilitate organisational learning from comments and compliments received, or from complaints made to Age UK Sutton.

2.2 Objectives

- 2.2.1 To work collaboratively internally, with partner organisations and other agencies where necessary to coordinate comprehensive outcomes to complaints.
- 2.2.2 To facilitate the effective and early resolution of complaints.
- 2.2.3 To use the analysis of complaints to help improve services and reduce the level of complaints.
- 2.2.4 To manage all complaints in an open and accountable way
- 2.2.5 Record and share comments or positive feedback and use this feedback to inform any future service improvements.

3. Compliments

- 3.1 We value and encourage all kinds of feedback. Anyone who has a relationship with Age UK Sutton can compliment a member of staff, a team or the organisation. Compliments are passed on to staff and their line manager, and are used to identify areas of good practice that Age UK Sutton can learn from and further develop.
- 3.2 Compliments can be submitted verbally to any member of staff who will record and share this or can be submitted through the Age UK Sutton website Online Contact Form, via email to info@ageuksutton.org.uk or in writing to the Age UK Sutton office.
- 3.3 Compliments and positive comments made to staff or volunteers during interactions or service provision are also recorded, with colleague encouraged to note these in a shared register.
- 3.4 Compliments are used to enable service development and as part of individual performance development. Employees receiving compliments will be recognised appropriately as part of the charity's reward and recognition activity.

4. Complaints

- 4.1 Complaints can arise from a number of issues including:
- 4.1.1 A failure to comply with policy, procedure or standards of service delivery
 - 4.1.2 A decision which the complainant believes is not fair or clear to them
 - 4.1.3 The behaviour of Age UK Sutton's staff, volunteers, associates, or contractors.
- 4.2 Age UK Sutton operates a complaints process with up to two stages:
- 4.2.1 Stage 1: Internal investigation of complaint. A full written response will be provided to the complainant within 10 working days.
 - 4.2.2 If the complaint remains unresolved at Stage 1, it will move to Stage 2.
 - 4.2.3 Stage 2: Appeal. Review of Stage 1 decision in response to an appeal made with specific grounds. A full written response will be provided to the complainant within 10 working days.

4.3 A complaint can be made in a number of ways to Age UK Sutton:

- In writing via letter or email
- Through the Online Contact Form on the [Age UK Sutton website](#)
- By telephone: 020 8078 0002
- In person to any member of staff
- To our trustees via Age UK Sutton, if you are dissatisfied with the outcome of your complaint response.

4.4 Age UK Sutton has an effective complaints management system in place through the following actions (where these timescales are not practically possible, Age UK Sutton will give reasons and agree new timescales with the complainant.):

4.4.1 Ensures that all customers know how to complain.

4.4.2 Makes personal contact with complainants, ideally by telephone, to understand their complaint, attempt resolution and update them.

4.4.3 Acknowledges all complaints in writing within 2 working days.

4.4.4 Responds to stage 1 complaints within 10 working days following receipt of the complaint.

4.4.5 Review and respond to stage 2 complaints within 10 working days following receipt of the escalation request.

4.4.6 Support vulnerable customers through the complaints process and, where appropriate, refer them to alternative services that may be able to assist them in making their complaint

4.4.7 Provide alternative avenues to seek support when the service requested is outside Age UK Sutton's remit where appropriate and where possible.

4.5 All complaints are logged on a central register, which is managed by senior management. In addition, a complaints record will be completed to record the complaint and progress of the complaint. **A Template complaint record can be found in the appendix.**

5. External Complaints Resolution Bodies

- 5.1 On the rare occasions when Age UK Sutton is unable to conclude its complaints process to the satisfaction of the complainant, they will be advised of their right to approach a designated person such as an MP, Councillor or a recognised resolution body. It should be noted that whilst Age UK Sutton is a Brand Partner of Age UK, Age UK does not have oversight of Age UK Sutton, and will pass on any complaints received to Age UK Sutton for investigation.
- 5.2 Complainants making complaints relating to services commissioned by the Local or Health Authorities retain their right to complain to these bodies directly at any stage.
- 5.3 Age UK Sutton respects the rights of customers to complain to these statutory bodies and will work openly with partner agencies to resolve any legitimate concerns that customers raise.

6. Persistent or vexatious complaints

- 6.1 It is considered that all complainants have the right to have their concerns examined in line with the relevant complaints procedure. In most cases, dealing with complaints will be a straightforward process; however in a minority of cases, the complainant may act in a manner that is deemed unacceptable.
- 6.2 They may act in a way that is considered abusive, unreasonably persistent or vexatious and by doing so it may hinder the charity's ability to investigate their complaint or the complaints of others. This behaviour may occur at any time before, during or after a complaint has been investigated.
- 6.3 The time spent on dealing with all complaints should be proportionate to the nature of the complaint and consistent with the outcome that is being sought being realistic and achievable.
- 6.4 It should be noted that raising a complaint to Age UK Sutton does not in itself constitute unreasonably persistent behaviour and neither do complainants who escalate through all stages of the relevant complaints procedure or those who express criticism about the complaints process itself.
- 6.5 Age UK Sutton has adopted the Local Government Ombudsman's definition and the identified characteristics for unreasonable or unreasonably persistent complainants "*For us, unreasonable and unreasonably persistent complainants are those complainants who, because of the nature or frequency of their contacts with an organisation, hinder the organisation's consideration of their, or other people's, complaints*".

Examples of unreasonably persistent behaviour:

(this list is not exhaustive, nor does one single characteristic on its own imply that the person will be considered as being in this category)

- Refusing to specify the grounds of a complaint, despite offers of help.
- Refusing to cooperate with the complaints investigation process.
- Refusing to accept that certain issues are not within the scope of Age UK Sutton's jurisdiction or within the scope of a complaints procedure.
- Insisting on the complaint being dealt with in ways which are incompatible with the adopted complaints procedure or with good practice.
- Making unjustified complaints about staff who are trying to deal with the issues, and seeking to have them replaced.
- Changing the basis of the complaint as the investigation proceeds.
- Denying or changing statements he or she made at an earlier stage.
- Introducing trivial or irrelevant new information at a later stage.
- Raising many detailed but unimportant questions, and insisting they are all answered.
- Submitting falsified documents from themselves or others.
- Adopting a 'scatter gun' approach: pursuing parallel complaints on the same issue with various members of staff and/or organisations.
- Making excessive demands on the time and resources of staff with lengthy phone calls, emails to numerous staff, or detailed letters every few days, and expecting immediate responses.
- Submitting repeat complaints with minor additions/variations, which the complainant insists make these 'new' complaints.
- Refusing to accept the decision; repeatedly arguing points with no new evidence.

Examples of abusive and/or vexatious complainants:

Age UK Sutton will take steps to protect its staff from members of the public who are behaving in a way which is considered abusive and/or vexatious. This may include physical or verbal abuse and could include the following (however this list is not exhaustive):

- Speaking to the member of staff or volunteer in a derogatory manner which causes offence.
- Swearing, either verbally or in writing despite being asked to refrain from using such language.
- Using threatening language towards staff or volunteers which provokes fear.
- Repeatedly contacting a member of staff or volunteer regarding the same matter which has already been addressed

6.6 If a complainant has made unreasonable complaints in the past, we will not assume that their next complaint is unreasonable. Each case will be considered on its merits. All relevant correspondence will be evaluated to consider the circumstances, including:

- 6.6.1 whether a complainant has made persistent or unreasonable demands
- 6.6.2 whether there is a strong likelihood that complaints are being made to intentionally cause harassment, divert resources or to disrupt the proper workings of Age UK Sutton
- 6.6.3 whether the complainant or their representative has been abusive or threatening to staff or has produced excessive correspondence
- 6.6.4 whether the complainant displays vexatious behaviour

7. Confidentiality

7.1 Under the Data Protection Act 2018 and the Human Rights Act 1998, all personal and sensitive organisational information, however received, is treated as confidential, including:

- 7.1.1 anything of a personal nature that is not a matter of public record about a customer, member of staff, volunteer or trustee
- 7.1.2 sensitive organisational information.

7.2 We will ensure that the members of staff managing the complaint only involve other agencies and share information with the consent of the individual concerned, unless:

- 7.2.1 Age UK Sutton is required to share information by law
- 7.2.2 The information is necessary for the safeguarding of vulnerable adults or children.

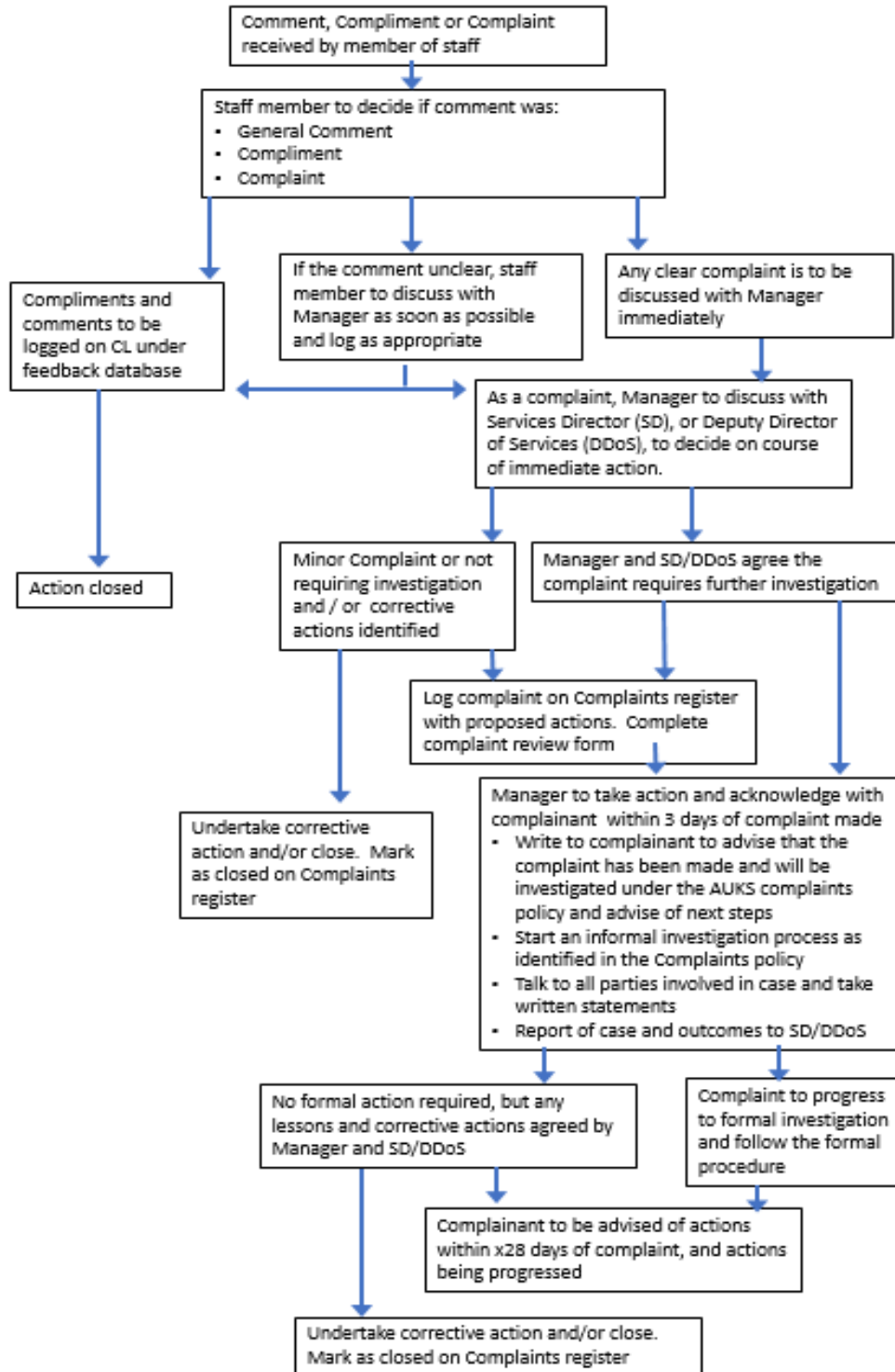
8. Monitoring and Reporting

- 8.1 Complaints and compliments will be monitored by Age UK Sutton's Senior Management Team and the complaint register is reviewed quarterly and reported to the Quality Committee. Any findings arising from complaints and compliments will be shared with our Board of Trustees and/or delegated subcommittees as part of a documented cycle of reporting. Significant exceptions will be reported immediately.
- 8.2 In line with best practice recommended by the Principles of Good Complaint Handling (Parliamentary and Health Service Ombudsman, 2009) Age UK Sutton seeks continuous improvement through using feedback and lessons learnt from complaints to improve service design and delivery.

Appendix 1 – Compliments and Complaints procedure



Comments, Compliments and Complaints Procedure flowchart



Appendix 2 – Complaint Investigation Record Template

This record should be used to note ALL interactions and activity relating to a complaint, including correspondence with the complainant, other parties involved, and internal decision making activity.

A Register of all complaints is kept and the Service Manager is asked to complete this as soon as a complaint is registered and progress of the complaint is updated.

Notes should be made as soon as is practicable after the interaction or activity and written in a non judgmental, factual, and succinct way.

Link to Complaint Record: [Complaint Investigation Record October 2022 record of complaint template \(sharepoint.com\)](#)

Name of Complainant:

Charitylog number:

Who is complainant (client/family member/professional etc):

Complaint manager:

Date record started	Name and role of Complainant	Notes and summary of the complaint
		<i>Record of complaint added to the Complaint Log: Yes / No</i>

Date/ Time	Action	Activity	Detail / records / Notes	Timescale / Completed
<i>Example</i>	1.Detail of complaint	<i>Call from Complainant to AUKS</i>	<i>John Smith, (CL number 0001) called the helpline to raise a complaint. The call was answered by Susan Brown, a volunteer, and transferred to Bob Jones, Manager. John Smith outlines concerns about an event planned for the next weekend.</i> <i>Full notes of call are filed at (link to document)</i>	

	2.Date and time advised to SMT			
	3.Action plan pre client contact			
	4.Who will manage the complaint			
	5.Complaint noted on CLOG			
	6. Response to client			
	7. Action log post conversation			
	7.Other staff involved and why?			
	Is it a complaint ?			

Appendix 3

Legislation, Regulation and Guidance

Government legislation has an impact on how Age UK Sutton can implement its Complaints and Compliments Policy. Listed below are the key regulatory standards and statutory Acts that have been acknowledged.

- The Care Act
- Mental Health Capacity Act 2005
- Equality Act 2010
- Principles of Good Complaint Handling (Parliamentary and Health Service Ombudsman, 2009)