

Postholder Responsible for Policy	Chief Executive
Directorate Responsible for Policy	Chief Executive
Contact Details	Pam.Orchard@cstm.org.uk
Date Written	22.07.2019
Approved by	QPC sub-committee
Date Approved	05.09.2019
Date Policy Becomes Live	01.10.2019
Other documents to be read in conjunction with this policy	<ul style="list-style-type: none"> • Vexatious Complaints • Safeguarding Policy • Disciplinary policy • Performance Improvement Policy

Version number	Version date	Reviewer	Amendment details	Next due for revision

1 Introduction

CSTM is a learning organisation and is committed to continuous improvement. We recognise that things will go wrong from time to time, or expectations will not be met, and that highlighting that this has happened is healthy and important. CSTM believe that feedback and complaints provide the opportunity for us to better understand the experiences of our clients and others we work with, and as such, these are valued and received positively.

CSTM aims to create a culture whereby feedback, concerns and complaints are handled in a respectful, constructive way and that we take every possible opportunity for learning, development and the strengthening of relationships. We recognise that where issues or concerns are suppressed or handled disrespectfully, this can cause resentment, anger and a breakdown in communication and that the potential for positive development is often missed. We therefore aim to create an environment that fosters good relationships between staff, clients and other parties and we offer a number of routes through which feedback and views can be shared.

2 Purpose and Scope

This purpose of this policy is;

- To provide a definition of feedback and complaints
- To outline our procedures for receiving and responding to feedback and complaints.
- To set out anticipated timescales for response and escalation processes including external escalation where applicable.
- To summarise processes for learning and review from complaints and feedback.

The policy applies to feedback and complaints received from clients, volunteers, visitors, external agency workers, staff from other agencies and other interested parties.

Complaints may also fall within the scope of other policies and the following policies should be read in conjunction with this policy.

- Vexatious Complaints Policy
- Safeguarding Policy
- Disciplinary policy
- Performance Improvement Policy

3 Definitions

Feedback is defined as suggestions, ideas and other information that indicates what is working well or what can be done to improve any aspect of our work at CSTM.

Complaints are defined as an expression of dissatisfaction made to CSTM in relation to our organisation, services or staff.

4 Feedback

CSTM has a comprehensive approach to facilitating staff, client and stakeholder feedback as part of the design, delivery and evaluation of our services. This includes focus groups, satisfaction surveys, suggestion boxes, consultations and working groups. Notice is provided to

potential participants in advance of any of these feedback approaches taking place. If you'd like to know more please speak to any member of staff.

Feedback can also be received at any time verbally or by email to a member of staff in writing via Our comments boxes or at comments@cstm.org.uk.

It is anticipated that most feedback will be received verbally and responded to immediately by a staff member or volunteer. When a member of staff or volunteer receives verbal feedback on any area of our work they should ensure that the person providing the feedback records the feedback on a comments card and that these are placed in the comments boxes.

Feedback received in the comments boxes are recorded centrally by the Client Involvement Coordinator (CIC) and responded to by the most appropriate person **within one month**. Responses to feedback received through the comments boxes will be posted next to the comments boxes at the end of each month.

5 Complaints Procedure

Complaints can be received verbally to any member of staff, or in writing on our complaints form (appendix A) and handed to a member of staff or posted to Complaints, Connection at St Martins, 12 Adelaide Street, London, WC2N 4HW.

Where required a staff member can assist the complainant to put the complaint in writing on the complaints form and/or arrange an interpreter. Once received all complaints will be added on to the case management system.

5.1 Informal Stage

Where a verbal complaint is received it is anticipated that in many cases a resolution will be found informally and without the requirement for further escalation or delay. In these circumstances a record should be made within the case management system by the staff member who dealt with the complaint and the complaint should be marked as resolved.

5.2 Formal Stage

If a complaint cannot be resolved informally the complainant should be advised and/or supported to put the complaint in writing and advised that they will receive a letter confirming receipt of the complaint and providing the details of the person dealing with the complaint within 3 working days.

Complaints will generally be dealt with by the Manager or Coordinator of the team to which the complaint most closely relates. If required, e.g. due to the perceived seriousness of the complaint, the Manager or Coordinator may choose to escalate the complaint to the relevant Service Lead and/or Director. If the complaint relates to a specific staff member the complaint should initially be dealt with by that staff member's line manager. If a Manager or Lead is unavailable for any reason the relevant Lead or Director would determine who should deal with the complaint.

The standard timescale for responding to a complaint is 20 working days from the date that the complaint was received.

The staff member dealing with the complaint would be responsible for;

- Clarifying the specifics and scope of the complaint
- Gathering all necessary information to respond to the complaint
- Conducting a follow-up meeting or telephone communication with the complainant as required.
- Conducting meetings with relevant staff members and other involved parties as required.
- Determining what the proposed course of action would be to rectify the situation and/or ensure that necessary improvements or adjustments are made (where applicable).
- Recording the actions onto the case management system and submitting for line management approval.

Where the complaint is about a staff member and the complaint raises potential safeguarding or disciplinary concerns this should be dealt with in accordance with those policies with consultation with HR and senior staff as required.

Once the complaint has been investigated the responsible staff member would provide a written response to the complainant which would include the following;

- A summary of the complaint received
- How the complaint was investigated
- The findings of the investigation and whether the complaint has been upheld
- The proposed course of action
- Information regarding the right to, and process for appeal.

If for any reason it is not possible to respond to the complaint in full within the 20 day timescale a letter will be sent to the complainant outlining the reasons for the delay and providing a date by which a full response should be expected.

5.3 Appeal Stage

If the person making the complaint is not satisfied with the response received, they have the right to appeal. To do this they must put in writing to the relevant Director the reasons for their dissatisfaction and how they wish the complaint to be resolved.

An appeals panel will then be convened within 10 working days of receipt of the appeal. This panel will comprise the relevant Director and another senior manager (Lead, Director or CEO) with no previous involvement with the complaint. The complainant will be invited to address the appeals panel should they wish. Alternatively, information or evidence can be submitted via written statements.

The appeal panel will;

- Read through all of the relevant documentation
- Consider any further representations made by the complainant
- Make a final decision regarding the proposed course of action.

Within 5 working days of the appeal panel taking place the relevant Director will write to the complainant outlining;

- The final decision regarding the complaint
- The reasons for that decision

- The proposed course of action where relevant.

5.4 External Escalation

In the case of complaints from residents at St Martins House, if a complainant remains dissatisfied after the appeals stage, there is the right to make complaints to the Registered Social Landlord (London and Quadrant Housing Trust and the Independent Housing Ombudsman Scheme. Full details of how to contact these organisations is available on request from CSTM staff members and will be detailed in the appeal outcome letter.

For complaints related to immigration advice regulated by the Office of the Immigration Services Commissioner (OISC), clients can chose to complain directly to OISC in the first instance or to complain to OISC if they remain dissatisfied after the appeals stage Address: Complaints Team 5th Floor 21 Bloomsbury Street London WC1B 3HF. This information is provided in the OISC client care letter.

6. Complaints about other organisations

CSTM work collaboratively with a range of partnership organisations, some of whom deliver services directly from CSTM premises. In circumstances where a complaint is received which relates to the services or staff of another organisation CSTM staff will advise and/or support the complainant to gain access to the necessary complaint details and/or policy for that organisation.

7. Vexatious Complaints

A small minority of individuals may use the complaints procedure to make complaints that are vexatious or unreasonable, in that they persist unreasonably with their complaints, and/or whose actions are unacceptable and/or who make unreasonable demands. Such actions may include the following: the amount of information sought; continuing to raise the same or similar matters repeatedly; the nature and scale of expected service; demanding a response within an unreasonable timescale; contacting multiple people within CSTM about the same issue; continual contact (whether by telephone calls, emails or letters) without adding anything new or constructive to the complaint; changing the substance of the complaint or continuing to complain about a problem without escalating it via the complaints process (this list is not exhaustive and is used for illustrative purposes). CSTM reserves the right to deal with these actions under its Vexatious Complaints Policy.

8. Monitoring and Evaluation

All feedback and complaints received under this policy will be recorded in the case management system. Approvals and escalation processes will ensure that there is adequate oversight and quality assurance of the process in real-time. A summary of all feedback and complaints along with actions and learning will be reported quarterly to the organisations Quality Forum, Client Advisory Panel and Quality, Policy and Compliance sub-committee.