



UKPHR

Public Health Register

Protecting the public – improving practice

August 2014

UKPHR's Policy for handling **comments, complaints and compliments** (Triple C) about its staff, volunteers and Board members¹ and whistleblowing

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Content

1. Introduction
2. Our commitments
3. Specifically in respect of complaints
4. Time
5. Reviews
6. Executive Director
7. Record-keeping
8. Learning points
9. Reporting
10. Awareness

¹ excludes complaints about registration processes, including decisions made by the Registration Panel and Registration Approval Committee, CPD, revalidation and fitness to practise

1. Introduction

UKPHR imposes on all its staff, volunteers and Board members high standards of integrity, honesty and ethical conduct.

In all its operations, UKPHR aims for quality outcomes of service delivery, willingness to learn and continuous improvement.

UKPHR's approach is one of devolved management and responsibility. Managers take responsibility for performance and it is managers who will operate this *Triple C* policy.

Our aim is to value all communications we receive from third parties, to respond positively to them and to take action commensurate with the seriousness of the matter raised.

We view comments, complaints and compliments as valuable sources of intelligence, enabling us to review and refine our services with the intention of improving those services wherever possible.

In the case of complaints, we specifically commit to learn the lessons of what goes wrong and implement changes so that we do not repeat the same mistakes over and over.

2. Our commitments

We want it to be easy for all third parties to provide us with comments, complaints and compliments. We have clear explanations and pathways on our website, we have a simple form which anyone may request for recording comments, complaints and compliments.

We do ask for something in writing (including email) for monitoring purposes and we will make a note of a conversation if a third party declines to give a comment, complaint or compliment in writing or is unable personally to do so.

But we do not want our procedures to be overly bureaucratic, time consuming and a diversion from what really matters – dealing promptly with comments, complaints and compliments.

We therefore make these commitments:

- We will publish our *Triple C* policy and, where appropriate, draw specific attention to it
- We will make it easy to give us a written comment, complaint or compliment
- We will within 3 working days acknowledge receipt of comments, complaints and compliments given to us in accordance with this policy
- We will deal with comments, complaints and compliments promptly and report back to the originator what we have done in response

- If dealing with a comment, complaint or compliment is a lengthy process we will send regular progress reports
- We will report in our Annual Report on our performance in relation to *Triple C*.

3. *Specifically in respect of complaints*

The following procedure will be followed when UKPHR receives complaints about its paid staff, volunteers including assessors and Board members.

When a complaint is received by UKPHR it will be dealt with in the first instance by the appropriate manager. If there is no obvious choice of manager, the Executive Director will nominate a manager or deal with the complaint or take responsibility for it personally.

The complainant will receive, in addition to acknowledgement that the complaint has been received, the contact details of a person to contact at any time until the complaint has been fully dealt with.

If investigation by UKPHR is required before the complaint can be dealt with, the manager must appoint someone to investigate the complaint or must investigate personally. A manager who is also an investigator may not also be the named contact for a complainant.

4. *Time*

It is difficult to pre-determine how long it will take to deal with a complaint because it will depend on variable factors like complexity and availability of witnesses.

UKPHR will, however, commit to resolve complaints within 28 working days or, if an extension beyond this time is needed, to report to the complainant within 28 working days explaining the stage reached, why it has not been possible to complete all stages within this time and estimating how much longer it will take.

UKPHR will report the conclusion of its dealing with the complaint in writing and will additionally offer further feedback, if the complainant wishes it, in such form and at such time as the complainant may reasonably request.

5. *Reviews*

If a complainant is unhappy with the outcome and wishes to take the complaint further, the following arrangements will apply in respect of reviews.

UKPHR will explain the review option in its communication of the outcome and any subsequent contact with the complainant. If a review is requested, the reviewer will explain what will be done, report progress and notify the outcome of the review.

The Registrar is designated to review how UKPHR has dealt with any complaint which is made by an applicant for registration as a specialist by way of retrospective assessment of a portfolio and which relates to that assessment up to but excluding any decision made by the Registration Panel and/or Registration Approval Panel.

In respect of all other complaints the Executive Director is designated to review how UKPHR has dealt with the complaint (or the Chair of the Board if the Executive Director has previously dealt with the complaint).

In all review cases the reviewer may confirm, vary or set aside the outcome and if the latter may substitute a different outcome.

There is no appeal from the decision of a reviewer.

6. *Executive Director*

If the Executive Director is the subject of the complaint, these rules apply.

The Chair of the Board will designate a Director or external lay or professional person to investigate and make a decision in the form of a recommendation to the Board in respect of the complaint.

The Executive Director may request a review of the recommendation before it is considered by the Board, in which case the Chair of the Board will appoint a panel of three persons to carry out the review. The panel may confirm, vary or set aside the recommendation and if the latter may substitute a different recommendation.

No Director who has previously dealt with the complaint may take part in the Board's consideration of the complaint. The Executive Director and/or a representative shall be entitled to be present and produce evidence and make representations to the Board before a decision in respect of the complaint is made.

7. *Record-keeping*

Managers are responsible for keeping a record of all comments, complaints and compliments that are received in accordance with this policy. Electronic records are sufficient for this purpose provided that they are regularly backed up and they are not deleted within a minimum period of three years.

Copies of all such comments, complaints and compliments will be sent electronically to the Executive Director for monitoring purposes.

Managers must inform a person who is the subject of a complaint that the complaint has been received and it is good practice also to ensure that any named staff, volunteers and Board members are notified of comments and compliments that refer to them.

A manager receiving a comment, complaint or compliment will (in addition to taking the steps already referred to) always consider what implication the comment, complaint or compliment has for service delivery, learning and continuous improvement.

8. *Learning points*

Where steps can be taken to improve service delivery as a result of consideration of the comment, complaint or compliment received, the manager dealing with the matter has authority to make the necessary change. If there are implications for areas of service delivery outside the manager's area of authority, these implications will first be discussed with relevant managers. Changes that are made must be reported to the Executive Director.

9. *Reporting*

The actions taken in response to comments, complaints and compliments will be reported within the proceedings of team and committee meetings as appropriate.

The Executive Director will in addition report regularly to the Board on comments, complaints and compliments received and the actions taken in response to them.

10. *Awareness*

It is the responsibility of the individual manager to ensure that relevant staff, volunteers and Board members know about application of the *Triple C* policy as it affects them.

If there are media implications of any aspect of implementing this *Triple C* policy, managers should always involve colleagues from the communications group.

For more information about this policy, contact:

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