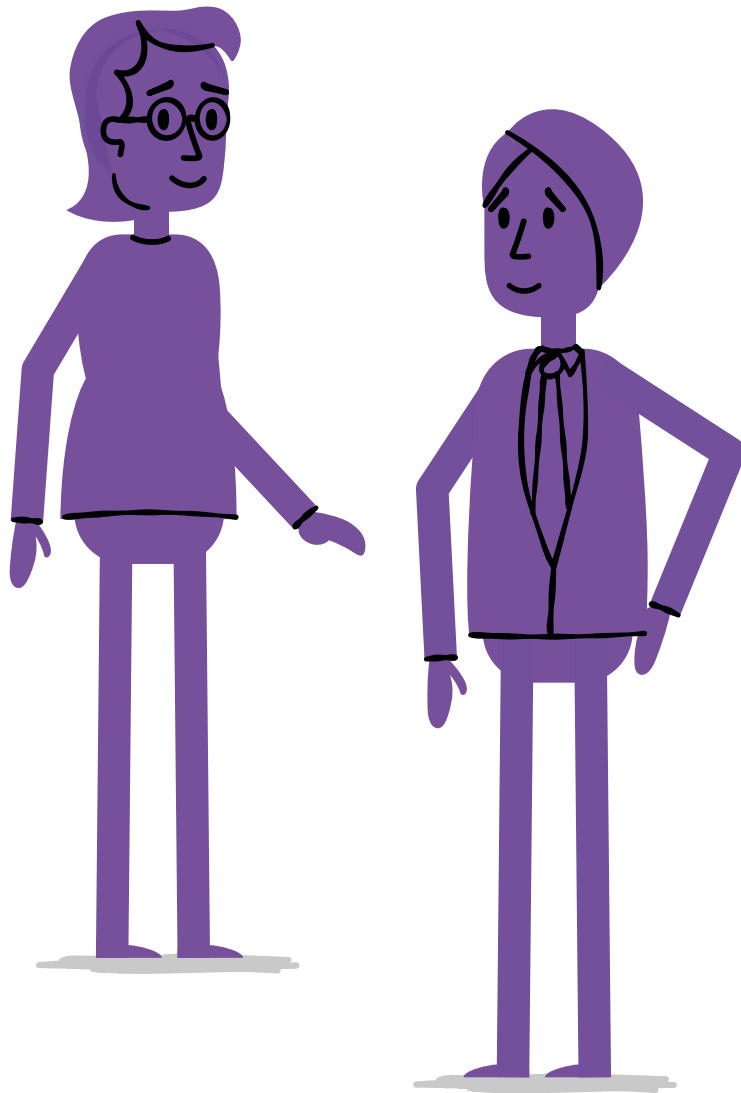
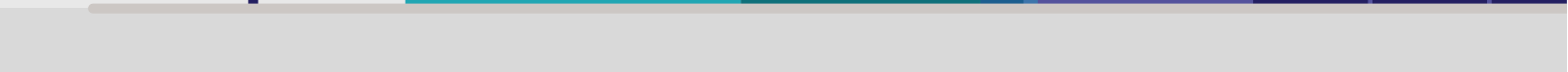


UK Central Government Complaint Standards:

Analysis of public consultation
responses and next steps



**Let's make
complaints
count!**



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Executive summary

Building on the success of the NHS Complaint Standards, we developed the UK Central Government Complaint Standards in partnership with Government organisations and advice and advocacy groups.

We carried out a two-month public consultation on the Standards between March and May 2022 across three channels:

- an online consultation survey (also provided in Easy Read format)
- virtual events, where PHSO held meetings with Government complaint networks to discuss the Standards and get feedback
- written requests for feedback sent to a range of Government departments and other public bodies.

Through these activities, we were able to get a good range of both public and professional stakeholder views on the Standards.

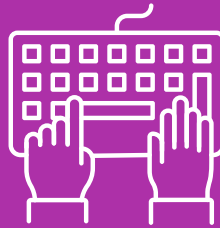
This report captures the main points from feedback gathered during the consultation and sets out how we are responding.



Headline data



167
responses to
consultation.



46% of responses were
from members of public
and 42% were from
Government staff.

91% of respondents support what the
Standards seek to achieve.

91% said PHSO should regularly report on how organisations
are meeting the expectations set out in the Standards.



66%

agreed/strongly agreed
that PHSO should be
given legislative powers to
set and enforce national
complaint standards for the
organisations it investigates.

1. Question 1: Breakdown of respondents

1.1 PHSO received 167 responses overall. 138 of those came via our main online survey, with nearly half of responses being from members of the public. We also received 29 responses (17%) via our Easy Read survey and several written responses from organisations outside the survey structure.

In what capacity are you providing feedback?¹

	Number	Percentage
Member of public	77	46%
Government staff - other	38	23%
Government staff - complaints team	21	13%
Third sector (for example, advocacy service)	13	8%
Government staff - senior management	10	6%
Other	8	5%
Total	167	100%

These figures indicate success in making sure the consultation reached a wide and diverse audience.

- 1.2 In the 'other' category, respondents ranged from complainants, PHSO staff and independent researchers/academics to representatives from professional bodies.
- 1.3 As the Easy Read survey had slightly different questions to meet audience needs, we cannot directly assimilate data. In addition, responses received outside the survey (including feedback from the engagement events and focus groups we carried out during the consultation) do not follow the question structure given in the surveys.
- 1.4 To manage this, we have combined the responses from the main and the Easy Read surveys wherever possible. Feedback and data given below is broken down into themes from each survey, alongside similar feedback given outside the survey that relates to the theme in question. References to questions relate to the main survey unless indicated otherwise.

¹ 9 respondents in the Easy Read version of the consultation ticked 'someone who works for a Government organisation'. They have been included in the table under Government staff - other.

2. Questions 3-6: Feedback on the introduction

- 2.1 These questions covered feedback for the introductory section of the Standards entitled: 'Definitions', 'About the UK Central Government Complaint Standards' and 'Why we need the Complaint Standards'.
- 2.2 **72% (n=120)**² of survey respondents agreed these were easy to understand.
- 2.3 **71% (n=118)** of respondents said they had a good or very good understanding of what the Standards aim to achieve after they read this section.
- 2.4 **68% (n=114)** respondents said this section covered all the background information they expected to see. The survey asked for feedback on what additional information should be provided. The main points were:
- more links to what this means for the service user making a complaint
 - how the Standards will be applied in practice in UK central Government departments
 - more details of what an ideal complaints process looks like in practice
 - clarity on whether the Standards are legal requirements or good practice guidance
 - clarity on the role and responsibility senior staff in UK central Government departments have in complaint handling
 - Some respondents said more should be done to recognise the fragmented experience of complaining to public service bodies. One third sector organisation told us that: 'from consultation with our community, it is clear they face a complicated and confusing complaints landscape'.

Feedback given on this area outside the survey

- 2.5 In other responses, we heard that more needs to be done to give context on how PHSO expects the Standards to be used in practice and what outcomes we would like to see. This correlates with some concerns given by Government departments that the expectation is that the Standards will replace their own procedures. Many felt this will cause difficulty, as departments operate in different sectors and one size does not fit all. Similar feedback was repeated at PHSO's engagement events.

Recommendations

- 2.6 We are pleased the detail given in the introduction to the Standards has largely been positively received. Respondents said that they would like to see more guidance on what an ideal complaints process might look like. This is important and would help give certainty about how the Standards can be applied in practice. PHSO has been working with Government partners to devise a model process and further guidance.

2 The overall number of respondents to the consultation was 167. However, not all respondents were given the same amount of questions. For example, some questions were specifically for Government department respondents. There were also some questions that respondents would only have been asked depending on their answers to previous questions. To be transparent about the total number of people who gave a particular answer, we have included the percentage of respondents followed by the number of respondents (n) this equates to.

- 2.7 More is needed in the Standards themselves to explain how they can be used in practice and what the longer-term outcome is for this work. This will help explain that the Standards are not designed to replace each individual complaints process in Government departments 'like-for-like'. They are intended to provide a benchmark that can be tailored and used to strengthen how an organisation handles complaints. We will also make clear that the Standards can be tailored for the myriad of different services UK central Government departments provide.
- 2.8 We will also include more on the current experience of complainants in this section and the complicated and confusing complaints landscape they face. This feeds into the aim of the Standards to provide a consistent vision of best practice that can be flexed to meet individual departmental needs.
- 2.9 More is already being done to demonstrate how the Standards can work in practice, through the design of a best practice model complaints process and related guidance. This is being designed within the Working Group and will be published alongside the Standards in due course.
- 2.10 PHSO will do more in the meantime to make clear that guidance will be available via ongoing external engagement on the Standards and next steps.

3. Questions 7-8: Complaint Standards at a glance

- 3.1 This refers to the one-page description of the four main headings given in the Standards and what they relate to.
- 3.2 **80% (n=110)** of respondents³ said this clearly summarised what organisations are expected to do.
- 3.3 When respondents were asked what further information was needed, feedback included the following:
- explaining in a more visual/less text-heavy way
 - providing a complaints process map
 - more detail on how the Standards will be applied in practice
 - timescales for handling complaints
 - more on ensuring Government departments accept complaints from third parties.

“There is [nothing on] timescales...there needs to be an acknowledgement of the complaint in the early stages and...when [you can expect] to hear something further – too many complaints just sit in the ‘ether’”

(Third sector respondent)

³ This question was not asked in the Easy Read version of the survey.

Feedback from outside the survey

3.4 No specific feedback was given on this section from responses outside the survey.

Recommendations

3.5 As with the NHS Complaint Standards, there is a need for a diagram of the Standards, which we will provide. While we appreciate the demand for a process map and timescales, these will understandably differ across Government departments.

3.6 The supporting documentation we will publish alongside the Standards will provide more detail on what best practice looks like in general. Organisations can then use this to decide what works best for their sector. We will look closely at the issue of third parties submitting complaints in that more detailed, practical guidance.

4. Questions 9-24: Promoting a learning culture⁴

4.1 **84% (69)** of respondents had a very good/good understanding of the first set of expectations in the Framework. **17% (4)** of main survey respondents felt that certain aspects were unclear in this section. The top three expectations seen as needing more information were:

- senior leaders make sure appropriate structures are in place to deliver fair and robust investigations - **64% (n=9)**
- senior leaders make sure colleagues are supported and trained to handle complaints - **57% (n=8)**
- senior leaders make sure every colleague knows how to deliver a learning culture - **50% (n=7)**.

4.2 When respondents were asked what more detail was needed about these expectations, the feedback centred on:

- defining what is meant by a senior leader
- ensuring these are relevant to all staff, not just senior leaders
- ensuring senior leaders are responsible for enabling joint working on complaints that span multiple organisations
- ensuring there is a practical commitment to training staff
- placing emphasis on demonstrating learning.

4 Questions about the details given in the sections were not asked in the survey for members of the public, as the targeted audience for this detail is Government staff and third sector organisations that are involved in complaints handling day-to-day.

“Colleagues working within the national complaints teams are trained very well, however less emphasis is given to complaints within the BAU sector. They lack empathy and do not offer or signpost where necessary.”

(Government department employee)

“...I believe complaints teams are not resourced sufficiently, and not given the adequate resources with experienced staff who can robustly and correctly investigate a complaint.”

(Government department employee)

4.3 Respondents were also asked to rank the most important expectations in this section:

Top three expectations in Promoting a learning culture	
Organisations make sure colleagues are trained to identify and respond to complaints in a way that meets the expectations set out in the Complaint Standards.	19% (n=14)
Every organisation has appropriate governance structures in place to ensure that senior leaders regularly review information arising from complaints and are held accountable for making sure that the learning is used to improve services.	17% (n=12)
Organisations put appropriate measures in place to capture feedback about their experiences from service users who make complaints and from colleagues directly involved. They use this to demonstrate how the organisation has performed towards meeting the Complaint Standards and what service users expect to see.	17% (n=12)

4.4 PHSO will use these priorities to plan how best to support the Standards. We will work with organisations to assess how well they currently meet these expectations, and the areas for development that each organisation may have.

4.5 **85% (n=70)** of main survey respondents felt nothing was missing from this section. Those who said there was gave the following feedback:

- senior leaders new in post should be given mandatory training that provides upfront understanding of their organisation's complaints process
- need more information on organisational accountability
- there should be specific reference to data on complaints that is published and reported to ministers
- need information on how third party/contracted services are to be involved in promoting a learning culture
- need a definition of what a complaint is.

Feedback given on this section outside the survey

- 4.6 Participants in PHSO's engagement events said this section helped to articulate what a learning culture looks like, and the emphasis on continuous improvement. But they said more was needed on defining who is covered by the term senior leader. Some Government staff felt that, at present, there was not a strong culture of learning and a limited understanding of the importance of complaints.
- 4.7 Many of those we spoke to placed emphasis on securing early buy-in from their senior leaders on the Standards.

Recommendations

- 4.8 There was consensus that this section was clear and spelt out the key aspects of promoting a learning culture. We will ensure that most of the suggested additions will be addressed in the supporting materials and guidance.
- 4.9 The most prominent feedback in this section was – again – defining the term senior leader. This term is covered in the glossary, and we will look at whether the explanation should be expanded or whether it would be better addressed in subsequent guidance/best practice regarding the roles and responsibilities of senior leaders.
- 4.10 Feedback also noted that this section does not include how third party/contractor services should be involved in promoting a learning culture. We will also consider how better links can be made to ensure the Standards outline the responsibilities of these organisations.

5. Questions 25-39: Welcoming complaints in a positive way

5.1 **87% (n=71)** of respondents had a very good/good understanding of this section. **15% (n=12)** of respondents said they felt certain aspects were unclear. The top three expectations that needed more information were:

- organisations clearly publicise how service users can raise complaints in a way that suits them and meets their specific needs. They offer a range of ways for people to complain and make it easy for everybody to understand how the process works. This includes being clear about who can make a complaint and what will happen next - **67% (n=8)**
- colleagues make sure they respond to complaints at the earliest opportunity. Colleagues consistently meet expected timescales for acknowledging a complaint. They give clear timeframes for how long it will take to look into the issues, considering the complexity of the matter - **50% (n=6)**
- organisations make sure colleagues can identify when issues raised in a complaint should be addressed (or are being addressed) via another route at the earliest opportunity, so a co-ordinated approach can be taken. Other possible routes include appeals, reference or statutory review by a tribunal or action in a court of law or disciplinary process. Colleagues know when and how to seek guidance and support from colleagues and can give service users information on where they can get support - **50% (n=6)**

5.2 When respondents were asked what more information was needed, the key headlines were:

- there is too much text - needs to be less wordy
- need more information on how these expectations are going to be achieved, monitored and mitigated
- need to define what is meant by 'a range of ways' for people to complain
- should include specific expectations for when an organisation is not able to meet expected timescales for responding to a complaint
- need more specifics on what timescales Government departments should be working towards.

5.3 The most important expectations in this section were ranked as follows:

Top three expectations in Welcoming complaints in a positive way	
All colleagues actively promote how service users can make a complaint. By openly welcoming complaints, they are able to identify and resolve issues quickly. Colleagues receive appropriate training in how to do this and make sure service users are being listened to and treated with empathy, courtesy and respect.	32% (n=23)
Organisations clearly publicise how service users can raise complaints in a way that suits them and meets their specific needs. They offer a range of ways for people to complain and make it easy for everybody to understand how the process works. This includes being clear about who can make a complaint and what will happen next.	22% (n=16)
Colleagues make sure they respond to complaints at the earliest opportunity. Colleagues consistently meet expected timescales for acknowledging a complaint. They give clear timeframes for how long it will take to look into the issues, taking into account the complexity of the matter.	11% (n=8)

5.4 Again, PHSO will prioritise these expectations in piloting and training. In this section, emphasis is given to organisations making it easy for users to know how to make a complaint and how they can get support in doing so.

5.5 **12% (n=10)** of main survey respondents felt that something was missing from this section. Feedback included:

- clarity on acceptable timescales for responses
- that colleagues will not be subject to blame for mistakes
- allowing joint or lead complaints, where many complainants who have been affected by the same failure can make just one complaint.

Feedback on this section from outside survey

5.6 Staff in engagement events noted that there was nothing missing, but that more could be done to promote and demonstrate how organisations use complaints as a valuable tool. Many felt that senior leadership buy-in is crucial for this section.

“Many departments focus on the culture of data and not on the story/effect behind a complaint, it would need to be made clear in how we change that culture in the Standard.”

(Government department employee)

5.7 Some departments felt that they cannot fully meet all the expectations in this section, as they receive many complaints where it is clear they cannot achieve the outcome sought. Some felt that adding more context, particularly on what level of redress can be provided, would help with this aspect.

5.8 Many staff also commented that this was quite dense in text and could be more concise.

Recommendations

5.9 This section received considerable support from respondents, although some felt more could be done to make things clearer. PHSO should focus on whether there is any opportunity to simplify/combine some of these expectations.

5.10 The feedback on what was missing focused mostly on providing more details about timescales, particularly what would be acceptable for most departments when they provide a response. This is an important topic, but it would not be possible to find a single timescale that would meet the different needs of each department. Instead, it is important that the Standards focus on the principles behind providing a timely and thorough response in specific circumstances.

5.11 Similarly, people asked for more practical details on what senior leaders' responsibilities will look like to promote a culture where the expectations in this section are realised. This will be an important aspect for how organisations embed the Standards, rather than requiring any specific change to the Standards themselves.

5.12 Some staff fed back that more should be said about balancing a desire to receive complaints with receiving complaints that may have unachievable outcomes. The Standards focus on ensuring organisations provide service users with as much useful information as possible so they can make informed choices, so this is already covered.

6. Questions 40-55: Being thorough and fair

6.1 **88% (n=72)** of respondents had a good or very good understanding of this section, although **10% (n=8)** of respondents said they felt the expectations were unclear. The top three expectations that needed more information were:

- organisations publish a complaints procedure that meets the Complaint Standards and all relevant Government guidance. Each procedure clearly sets out how colleagues will handle complaints and which quality standards and behaviours they are expected to follow when doing so - **57% (n=4)**
- when a complaint does not suit early resolution and needs detailed consideration or a formal investigation, this is done fairly. Where possible, organisations make sure they assign complaints to colleagues who have had no prior involvement - **43% (n=3)**
- six other expectations had an equal score of **29% (n=2)**

6.2 Feedback was as follows:

- the term 'protected time' is ambiguous
- not sure what 'key parties' was referring to
- what does 'regular updates' mean - is this a simple update, or something more involved?
- what is meant by 'where appropriate' - need to spell out the actual circumstances or this could lead to inconsistencies
- the expectation about assigning complaints to colleagues with no prior involvement can potentially be confused with the independent tier. Others fed back that this should say the colleague should be 'independent' or 'impartial'.

6.3 The most important expectations ranked in this section were:

Top three expectations in Being thorough and fair	
Organisations make sure all colleagues who look at complaints have the appropriate resources, support and protected time to do so in order to meet these expectations consistently.	28% (n=20)
Organisations make sure all relevant colleagues have the appropriate level of training, skills, and authority to look into complaints thoroughly.	17% (n=12)
At all times, colleagues look for ways they can resolve complaints at the earliest opportunity.	14% (n=10)

6.4 This feedback will help PHSO work with departments so they can ensure staff have the right levels of capacity and support to handle complaints. Our guidance will also emphasise how to approach the early resolution of complaints.

6.5 **6% (n=5)** of main survey respondents felt that something was missing from this section. Feedback included:

- not enough detail on how to keep complainants informed
- training should be co-produced with service users and complainants.

Feedback on this section from outside survey

- 6.6 Many Government staff at engagement events felt the bullets covered everything needed, although some felt this section was a bit too technical for a wider audience. Staff felt that the most important expectation here was about providing training to look at complaints thoroughly. The second most important expectation was that organisations publish a complaints procedure that meets the Standards and other guidance.
- 6.7 Some staff noted that, at present, if issues are resolved quickly at the first point of contact, they will not be recorded in the department's complaint system.
- 6.8 Staff felt that protected time was important, particularly in departments where staff were required to handle complaints in addition to their day job.
- 6.9 Staff also felt that some of this was utopian and did not reflect the current realities and challenges faced in stretched and busy departments. However, staff felt that training and support were crucial – and this was one of the most important expectations in this section.

“If not enough resource/training/time is given, the Standards may collapse. If organisations can't meet the Standards, they might struggle to secure senior buy-in.”

(Government department employee)

Recommendations

- 6.10 Overall, respondents felt this section could benefit from a more concise and plain English approach, and this was supported by Government staff, who noted that this could be seen as being more technical by wider audiences. As such, work is needed to better describe more technical terms such as 'protected time', 'key parties' and 'regular updates'.
- 6.11 It is not clear why **57% (n=4)** of respondents felt the expectation about publishing a complaints procedure that meets the Standards was unclear, as little detail was given in the survey. Some comments mentioned that the link to quality standards and behaviours was not detailed enough.
- 6.12 Feedback across the consultation showed a desire for PHSO to issue more guidance on how staff can apply the Standards in practice, which will be met through the supporting materials. Many Government staff felt that publishing a complaints procedure that meets the Standards was very important for their organisation, and that this aligns with our work to produce a model procedure to assist in that task.
- 6.13 The feedback about the expectation to assign complaints to colleagues who have had no prior involvement is useful and aligns with staff feedback about making this aspect clearer. This expectation should be reworded.
- 6.14 Overall, there was a clear consensus that this section covered everything it needed to cover about carrying out a thorough and fair look at a complaint, with **94% (n=77)** of respondents saying nothing was missing.

7. Questions 56-68: Giving fair and accountable responses

7.1 **90% (n=74)** of survey respondents had a good or very good understanding of this section, although **7% (n=6)** went on to say that some expectations were unclear. The top three expectations regarded as unclear were:

- in more complex cases, colleagues make sure they share their initial views on a complaint with key parties involved and give them the opportunity to respond. Colleagues make sure they take any comments into account in their final response to the complaint - **80% (n=4)**
- four expectations received **40% (n=2)**
- the remaining two expectations received **20% (n=1)**.

7.2 Feedback on what was unclear included:

- the expectations do not explain in detail how they will be achieved, monitored and mitigated, including what resources will be made available to meet them
- sharing initial views will add additional complexity and delay the complaints process
- one respondent felt it was unclear what was meant by the expectation that service users should be *“kept involved and updated on how [organisations] are taking forward all learning and improvements relevant to their complaint”*.

7.3 The most important expectations ranked in this section were:

Top three expectations in Giving fair and accountable responses	
Organisations make sure colleagues are supported and encouraged to be open and honest when things have gone wrong or where improvements can be made. Colleagues recognise the need to be accountable for their actions, and to identify what learning can be taken from a complaint and how this will be acted on to improve services and support colleagues.	32% (n=23)
Colleagues give a clear, balanced account of what happened, based on established facts. Each account compares what happened with what should have happened. It gives clear references to any relevant legislation, standards, policies or guidance, based on objective criteria.	25% (n=18)
Wherever possible, colleagues explain why things went wrong and identify suitable ways to put things right for people. Colleagues make sure the apologies and explanations they give are meaningful and sincere, and openly reflect the impact on the individual or individuals concerned.	21% (n=15)

- 7.4 These top three expectations indicate the importance of giving clear and accountable responses and putting things right openly when mistakes are made. These are important fundamentals for the Standards and will be a core thread in training and guidance.
- 7.5 **6% (n=5)** of respondents felt there was something missing from this section. However, no substantive feedback was given in the responses, other than the expectations could be more concise and more was needed to explain how they can be applied in practice.

“Statements in the Standards are high level and there will be a need for training and guidance from PHSO to put these into practice.”

(Government department employee)

Feedback on this section given outside the survey

- 7.6 Government staff in engagement sessions felt that this section was clear and understandable. Some staff felt that this could slot into their existing processes quite easily.
- 7.7 Some staff felt it will be crucial for organisations, particularly their senior leaders, to fully support the expectations to be open and transparent when things have gone wrong and make sure staff feel supported to learn from (and act on) complaints. Some felt that a blame culture is still prevalent across departments, and therefore this would be a departure from some cultural norms.

“Where things have gone wrong, feeling supported in raising those issues and look to gaining learning from them is important.”

(Government department employee)

- 7.8 When asked about challenges in this section, some staff mentioned that keeping service users involved and updated in how the organisation is acting on the learning from their complaint will be difficult, depending on the size of the organisation. This highlights the need for balance between giving service users a consistent experience and meeting the specific needs of each organisation, which will be the focus of the supporting materials.

Recommendations

- 7.9 Feedback given inside and outside the survey indicated a broad consensus that these expectations provided the necessary framework of best practice for responding to complaints fairly and with an emphasis on accountability and learning.
- 7.10 Again, the predominant issue raised was how PHSO will ensure it supports departments when they apply these expectations. This was a constant theme across all four sections of the Standards. It has reinforced the view that the primary need for next steps is to publish the model procedure and guidance to support staff.

8. Questions 69-78: Overall impressions of the Complaint Standards

8.1 **82% (n=113)** of respondents said it was clear what the Standards are trying to achieve. For those who disagreed, feedback included:

- they are too wordy, and should be written in simple and clear language
- lack of detail about how the Standards will be applied in practice
- concerns that this will be used as a tick-box exercise rather than a driver for cultural and behavioural change
- it is just words and will need to be demonstrated in practice.

“The Complaints Standards are great, and I very much look forward to them being implemented to ensure that there is a fair, open, transparent and understanding way that complaints can be processed and investigated, as this is not happening at the minute.”

(Advocacy worker)

8.2 **91% (n=125)** of respondents supported what the Standards are trying to achieve.

8.3 **59% (n=82)** of respondents felt nothing was missing or was yet to be explained in the Standards. Of those who said more was needed, the feedback was:

- describing how there needs to be a culture shift across Government departments so that they understand their complaints policy and are “actively involved in the work needed to resolve complaints”
- definition of a complaint was too restrictive and there needs to be clarity between a complaint and other feedback
- more focus on trying to avoid complaints via early warning systems, using better communication, and better use of remedy earlier on
- more emphasis on departments giving all staff effective and appropriate training in handling complaints
- more detail on the role and responsibilities of all staff in handling complaints
- more on accountability and not just simply learning lessons.

- 8.4 Respondents were then asked to rank (in order of priority) what the next steps should be for embedding the Standards. The top five steps were⁵:
- PHSO should issue detailed guidance on how to deliver these expectations - **74% (n=87)**
 - PHSO should design and deliver training for UK Central Government staff on the Complaint Standards - **65% (n=73)**
 - senior staff should commit to embedding the Standards in their organisation - **63% (n=73)**
 - organisations should adopt a model complaints handling process based on the Standards - **62% (n=71)**
 - organisations should review the number of complaint stages in their process to ensure they promote an efficient service - **40% (n=46)**.
- 8.5 These priority areas align with the feedback consistently given in other areas of the consultation and align with our plans to support how the Standards are embedded. We particularly note the desire for senior staff to commit to the Standards and begin work to look at how they can be used to strengthen their department's complaints processes.
- 8.6 **65% (n=39)** of Government staff who responded to the consultation said that there were no factors that would prevent their organisation from using the Standards. Of the **35% (n=21)** who said there were preventative factors, most mentioned:
- buy-in from senior staff: staff felt that the Standards will not work if senior leaders do not support them
 - lack of investment and resources: staff felt that departments are continuously required to cut costs and this can often result in reduced investment in training and resources for handling complaints
 - lack of expert resources: staff felt that, in some departments, complaint handling roles should be specialised and this should be reflected in job grading, but this is very rarely seen
 - one size cannot fit all: some staff felt this will not support larger organisations that deal with significant volumes of complaints
 - significant culture change: linked to the senior leadership issue, staff said it would be difficult or slow for these expectations to be embedded in their organisation as this would require a significant cultural change.
- 8.7 **74% (n=102)** of all respondents felt there were factors that would prevent the Standards from working effectively, with the same broad themes as given above.
- 8.8 We received significant feedback on this section from members of the public and third sector respondents. Overall, there was a broad view that a defensive culture towards complaints exists across many Government departments.

⁵ Percentages given below relate to the total number of respondents who ranked the expectation as a highest or higher priority (1-4 on an 8-point priority scale).

“In my experience Government departments, when faced with a complaint against a member of staff, will ‘circle the wagons’ or obfuscate and delay hoping the complainant will simply go away.”

(Member of the public)

“It often feels like you’re jumping through hoops just to get to the stage where you can go to the Parliamentary Ombudsman to make a complaint via the local MP. There is little confidence that a resolution will be reached before then. So past experience is possibly a big barrier. Changes need to be made to make sure a complaint is handled and responded to.”

(Advocacy worker)

Recommendations

- 8.9 The unequivocal support for what the Standards are trying to achieve provides additional validation for this work and gives PHSO the momentum to look closely at how to embed the Standards. The clear priority areas given in the consultation for next steps align completely with PHSO’s views on this issue.
- 8.10 One clear priority was for senior leadership across Government to commit to embedding the Standards in their work. This will be of key importance in each individual department as the Standards are published. While many Government staff felt that there were no barriers to embedding the Standards, they did voice their natural concerns about getting senior buy-in from within, alongside a commitment to provide support through training and resources. This is fundamental to the success of the Standards, and PHSO will continue to emphasise the importance of this.
- 8.11 PHSO received significant feedback from all respondents about the cultural barriers that may exist across Government departments. Many noted that, for the Standards to succeed, there needs to be significant cultural change in some areas. We recognise that, in our engagements, some departments are already reforming and developing their culture towards complaints and see the Standards as a supportive tool to continue that journey. This is encouraging, but more is needed and we will continue to work across the sector to develop supporting materials for senior leadership (and all staff) on how this can be done effectively.

9. Questions 79-80: Expansion of My Expectations

- 9.1 My Expectations provides a user-led vision for how health and social care organisations should approach the user experience when handling complaints. It sets out a core set of expectations for what a complainant should experience throughout the complaint process.
- 9.2 PHSO's consultation asked respondents whether PHSO should work with UK central Government departments to expand My Expectations to cover this sector.

Do you think that PHSO should work with UK central Government departments to ensure My Expectations also covers what people expect to experience when complaining about them?

	Government staff	Member of public	Third sector (for example, advocacy service)	Other	All respondents
Yes	82%	81%	92%	88%	83%
No	3%	7%	8%	0%	5%
Don't know	15%	12%	0%	13%	12%
Total	100%	100%	100%	100%	100%

- 9.3 **83% (n=114)** of all respondents said that My Expectations should also cover UK central Government departments, with a significant number of Government staff agreeing to this. Only **5% (n=7)** disagreed.

Responses from outside the consultation

- 9.4 Some departments (via written responses) did not believe that My Expectations should cover this sector. In particular, some respondents felt that it would potentially clash with existing service charters, or other public-facing documents of a similar nature.

Recommendations

- 9.5 While some departments have reservations, there was an unequivocal view that My Expectations is relevant to the Government sector. Given that the Standards are built around delivering the vision set out in My Expectations, it is important that we explore how it can be made relevant across UK central Government services.
- 9.6 My Expectations is also very relevant to addressing the issue that the primary audience for the Complaint Standards is Government staff, rather than the service user, as it is designed to support them when handling complaints in practice. There is a strong case for a further document that sets out how the Standards translate into what the service user should expect, and My Expectations clearly covers that.

- 9.7 This would align with the outstanding recommendation for PHSO to undertake a review, with Healthwatch and LGSCO, of My Expectations overall. This may include extending it to cover the expectations of staff who are subject to a complaint.
- 9.8 However, there was concern about whether My Expectations would clash with organisational customer charters or similar documents. This will need to be considered so that what is covered does not make it difficult or impossible for the organisations to meet their existing charter commitments.
- 9.9 It is also important to note that My Expectations will only specifically cover what the common experience should be when raising a complaint in this sector. It will not impinge on other customer service commitments often presented in such charters.

10. Questions 81-83: Embedding the Standards and reporting on progress

10.1 Survey respondents were asked to outline what steps they thought PHSO should take to ensure organisations embed the Standards in their processes. Each group responded as follows:

10.2 Government staff

- an annual review of performance
- co-production of supporting materials
- effective training and support
- standardised materials.

10.3 Members of the public

- annual accountability reporting for each organisation
- regular audits of complaints performance and processes
- ensure direct contact with organisations to support them in handling complaints
- publication of complaints data (number of complaints and time taken to resolve them).

10.4 Third sector staff

- ensure connectivity across different organisations to share best practice and facilitate innovation in handling complaints
- interactive training methods and materials, co-produced with service users
- monitor numbers of complaints and compare between departments
- ask organisations to conduct surveys of their staff to gauge awareness of the Standards
- issue detailed accompanying guidance
- develop new reporting systems to ensure learning is captured.

“We recommend that PHSO regularly work with organisations to design new reporting systems to ensure learning is captured and reported regularly. In this vein, PHSO should have the powers to carry out thematic reviews, start investigations on its own initiative, and carry out joint investigations with organisations covered by the Standards.”

(Third sector respondent)

10.5 **91% (n=126)** of all respondents said PHSO should regularly report on how organisations are performing towards meeting the standards. **92% (n=127)** also said PHSO should undertake regular reviews to update the Standards in the future.

Recommendations

10.6 The common theme for next steps across the different respondent groups was for PHSO to:

- regularly report on progress
- create training and supporting materials
- directly engage with organisations to support them in embedding the Standards
- develop reporting systems to ensure learning is captured.

10.7 These fully align with the next steps PHSO is taking with its partners.

11. Question 84: Feedback on whether PHSO should become a Complaint Standards Authority

11.1 **66% (n=91)** of respondents agreed that PHSO should be given legislative powers to set and enforce national Complaint Standards for the organisations it investigates.

11.2 Feedback given in the survey did not provide any consistent theme regarding why people agreed or disagreed with this issue. Some Government staff noted that such powers would ensure all organisations would act consistently. Others noted that a common approach through training resources and guidance could only help and improve services. Some wondered whether this would simply add additional bureaucracy, and that it would perhaps penalise those organisations that are committed to learning from complaints.

“By having legislative powers to set and enforce [the Standards], it will ensure that all organisations are working in a consistent manner and then all our customers will know what they should expect from us. It will also ensure that customers are receiving the best possible service based on clear and effective standards.”

(Government department employee)

Recommendations

- 11.3 Many respondents agreed that PHSO should be given powers to enforce national Complaint Standards across central Government departments, which builds on the similar sentiment towards the NHS Complaint Standards. However, some thought this would be seen as unnecessarily bureaucratic and would limit autonomy and discretion.
- 11.4 The clear advantage is that consistency of service and experience across Government departments would be easier to achieve. It is important to note that concerns regarding bureaucracy and inflexibility were already apparent at the beginning of this project. This is one of the main reasons we developed the Standards in collaboration with central Government departments.
- 11.5 The main feature of such powers is to support and empower those who use the Standards to promote consistency and the learning culture all departments agree is vital. It also enables PHSO to identify and work with organisations that are not performing as well or where there is a lack of awareness of, or reluctance to embed, the Standards. Such powers would be crucial to ensure there is effective intervention to identify and address such issues through the lens of providing support, coaching and development.
- 11.6 Obtaining Complaint Standards Authority powers is part of the wider and urgent need for wholesale reform to create a new, modernised Public Services Ombudsman in England. PHSO's outdated powers put us out of step with devolved nations in the UK, and with international benchmarks of good practice.
- 11.7 In the absence of any Parliamentary time available during this Parliament to bring forward a Public Services Ombudsman Bill, we will continue to engage and seek opportunities to achieve incremental reform to PHSO's service. In parallel, we will continue to work across both the NHS and UK central Government to help embed the Standards in practice. We will use the evidence we capture from that to demonstrate how progress can and will be strengthened through PHSO becoming a Complaint Standards Authority.

Action points for PHSO

How we're improving the Standards based on feedback

Feedback

Action points

Introduction to the Standards

- Give more information about how the Standards can be applied in practice in UK central Government departments.
 - Say more about what an ideal complaints process looks like in practice.
 - Some respondents said more should be done to recognise the fragmented experience of complaining to public service bodies.
- Add more about why the Standards are needed, what issues they address, and what outcomes are sought.
 - Add more about designing materials that support how the Standards can be used in practice.
 - Explain that embedding the Standards is not a one-size-fits-all approach.
 - Add more context on the current experience of complaining for the service user.

Feedback

Action points

At a glance

- Explain this in a more visual/less text-heavy way.
- Make the text less wordy.
- Add a diagram of the main sections of the Standards.

Promoting a learning culture

- Text is too wordy. It should be made shorter and in plain English.
- Do more to describe who is a senior leader.
- Ensure these expectations are relevant to all staff, not just senior leaders.
- Review and edit the entire document to make it less wordy.
- Provide a more detailed description of who is a senior leader in the model complaint handling procedure.

Welcoming complaints in a positive way

- Make these easier to read.
- Clearly explain how these expectations are going to be achieved, monitored and mitigated.
- Define what is meant by a 'range of ways' for people to complain.
- Refresh these expectations to make them clearer, including combining some expectations.
- Set out all the ways service users can complain in the model procedure.

Being thorough and fair

- Better explain what is meant by protected time, key parties and regular updates.
- Explain clearly what assigning complaints to colleagues with no prior involvement means.
- Provide better explanations of technical terms, such as protected time, key parties, and regular updates.
- Reword expectation about assigning complaints to colleagues who have had no prior involvement so it is clearer.
- Place more emphasis on demonstrating impartiality and thoroughness.

Feedback

Action points

Giving fair and accountable responses

- Make these expectations clearer and less wordy.
- Explain how these expectations will be achieved, monitored and mitigated, including what resources will be made available to meet them.

- Make these expectations clearer and more concise.
- Make sure supporting materials explain how these expectations will be achieved.

Overall impressions of the Complaint Standards

- Need to be described in simple and clear language.
- More needed about how they will be applied (and demonstrated) in practice.
- The role of senior leadership will be critical in changing cultures – this needs to be defined.

- Create supporting materials that explain how the Standards can be applied in practice.
- Begin work on designing senior leadership materials (including training, development and guidance).

Expanding My Expectations to cover UK central Government departments

- **85%** of respondents agreed My Expectations should cover the UK central Government sector.
- Some departments are concerned this will cut across existing customer charters.

- Work with Government department partners to review how My Expectations can become applicable to this sector.

Feedback

Action points

Embedding the Standards and reporting on progress

Common theme for next steps included that PHSO should:

- regularly report on progress
- work with partners to create training and supporting materials
- ensure it has direct engagement with organisations to support them in embedding the Standards
- work with partners to develop reporting systems for capturing and acting on learning from complaints.

- Continue to work with partners on the design of materials and training.
- Develop reporting systems and deliver a programme of engagement to help organisations embed the Standards.

PHSO as Complaint Standards Authority

- **66%** of respondents agreed PHSO should be given legislative powers to set and enforce the Standards.

- Work with organisations to help them embed the Complaint Standards in practice. Use evidence captured from this work to show how progress can be strengthened by PHSO becoming a Complaint Standards Authority.

If you would like this document in a different format, such as Daisy or large print, please contact us.

**Let's make
complaints
count!**

