

The University of Glasgow Complaints Handling Procedure

Adapted from the Scottish Higher Education Model Complaints Handling Procedure as set out by the Scottish Public Service Ombudsman (SPSO)

Part 1: Introduction and overview

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Part 1: Introduction and overview

1.1 Foreword

The University of Glasgow' Complaints Handling Procedure (CHP) reflects our commitment to valuing complaints. It seeks to resolve dissatisfaction as close as possible to the point of service delivery and to conduct thorough, impartial and fair investigations of complaints so that, where appropriate, we can make evidence-based decisions on the facts of the case.

This procedure was first developed by the Scottish Public Services Ombudsman (SPSO), in collaboration with representatives of the Higher Education sector. The Model Complaints Handling Procedures (MCHPs) were revised in 2019 by the SPSO in consultation with all sectors. This new edition includes a core text, which is consistent across all public services in Scotland, with some additional text and examples specific to this sector. As far as is possible we have produced a standard approach to handling complaints across Scotland's public services, which complies with the SPSO's guidance on a MCHP.

The CHP aims to help us 'get it right first time'. We want quicker, simpler and more streamlined complaints handling with local, early responses by capable, well-trained staff.

All new staff across the University of Glasgow are made aware of this procedure as part of their induction and refresher training is given as required, to ensure they are confident in identifying complaints, empowered to resolve simple complaints on the spot, and familiar with how to apply this procedure (including recording complaints).

Complaints give us valuable information we can use to improve. Our Complaints Handling Procedure will enable us to address a complainant's dissatisfaction and may help us prevent the same problem from happening again. For our staff, complaints provide a first-hand account of the complainants' views and experience, and can highlight problems we may otherwise miss. Handled well, complaints can give our students and other members of the public a form of redress when things go wrong, and can also help us continuously improve our services.

Handling complaints early creates better relations with students and other members of the public. Handling complaints close to the point of service delivery means we can deal with them locally and quickly, so they are less likely to escalate to the next stage of the procedure.

The Complaints Handling Procedure helps us keep the user at the heart of the process, while enabling us to better understand how to improve our services by learning from complaints.

1.2 Structure of the Complaints Handling Procedure

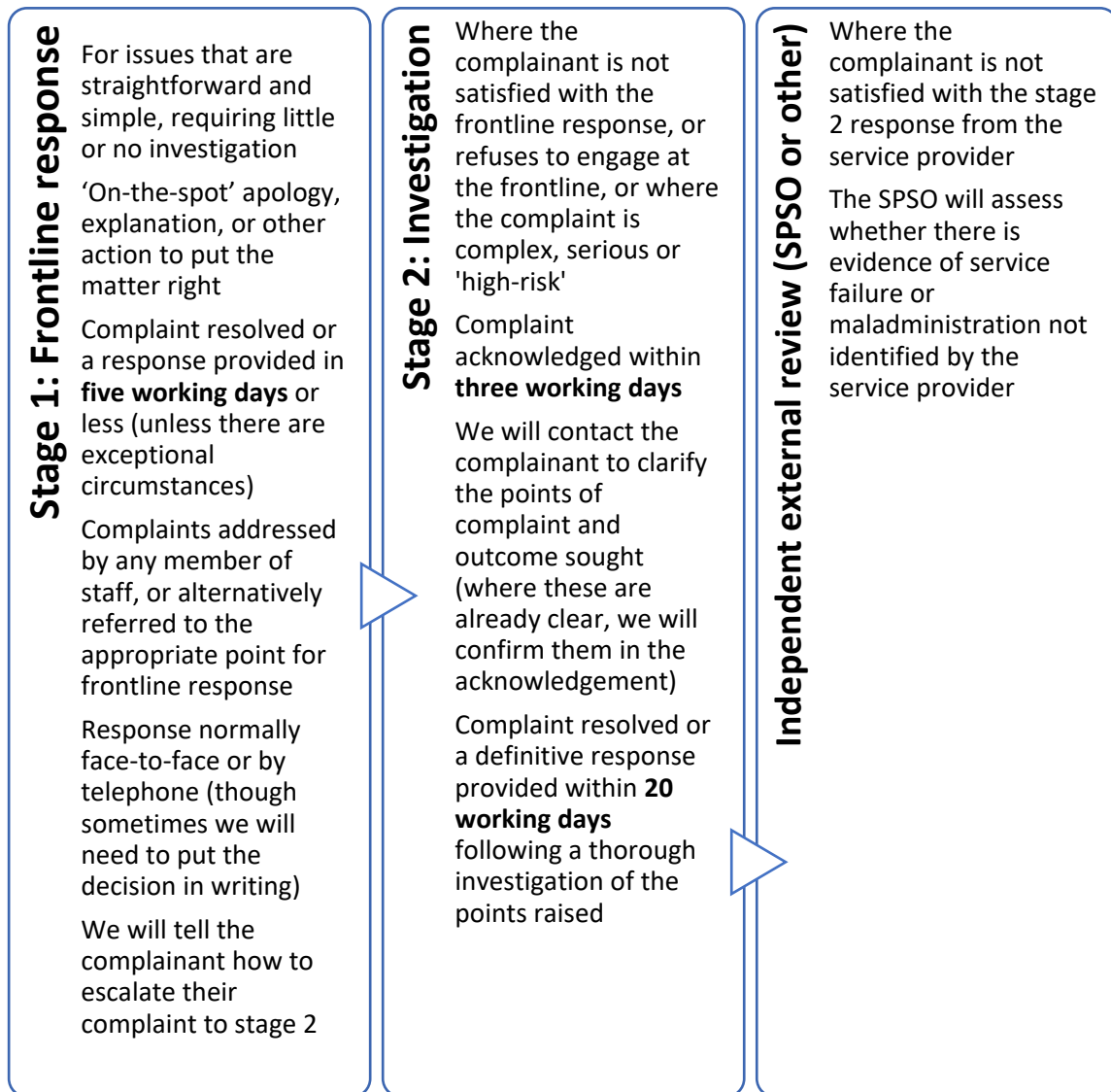
1.2.1 This Complaints Handling Procedure (CHP) explains to staff how to handle complaints. The CHP consists of:

- Overview and structure (part 1) – this document
- When to use the procedure (part 2) – guidance on identifying what is and what is not a complaint, handling complex or unusual complaint circumstances, the interaction of complaints and other processes, and what to do if the CHP does not apply
- The complaints handling process (part 3) – guidance on handling a complaint through stages 1 and 2, and dealing with post-closure contact
- Governance of the procedure (part 4) – staff roles and responsibilities and guidance on recording, reporting, publicising and learning from complaints
- The guide for students (part 5) – information for students and members of the public on how we handle complaints

1.2.2 When using the CHP, please also refer to the 'SPSO Statement of Complaints Handling Principles' and good practice guidance on complaints handling from the SPSO. www.spsso.org.uk

1.3 Overview of the CHP

- 1.3.1 Anyone can make a complaint, either verbally or in writing, including face-to-face, by phone, letter or email.
- 1.3.2 We will try to resolve complaints to the satisfaction of the complainant wherever this is possible. Where this isn't possible, we will give the complainant a clear response to each of their points of complaint. We will always try to respond as quickly as we can (and on the spot where possible).
- 1.3.3 Our complaints procedure has two stages. We expect the majority of complaints will be handled at stage 1. If the complainant remains dissatisfied after stage 1, they can request that we look at it again, at stage 2. If the complaint is complex enough to require an investigation, we will put the complaint straight into stage 2.



1.3.4 If a complainant remains unhappy once the investigation stage has been completed, the complainant is entitled to ask the SPSO to look at their complaint. The SPSO considers complaints from people who remain dissatisfied at the conclusion of the University's Complaints Procedure. The SPSO looks at issues such as service failure and maladministration (administrative fault) as well as the way the University has handled the complaint.

1.3.5 For detailed guidance on the process, see Part 3: The complaints handling process.

1.4 Expected behaviours

1.4.1 We ask complainants to engage actively with the complaint handling process by:

- telling us their key issues of concern and organising any supporting information they want to give us (we understand that some people will require support to do this)

- working with us to agree the key points of complaint when an investigation is required; and
 - responding to reasonable requests for information.
- 1.4.2 We ask those bringing a complaint to treat our staff with respect. We also expect all staff to behave in a professional manner and treat complainants with courtesy, respect and dignity.
- 1.4.3 In a small number of cases the actions or behaviour of individuals using the Complaints Handling Procedure result in making it difficult for University staff to deal with their complaint as it involves abuse of our staff or our process. In such cases, the University will take action to protect staff, taking into account their ability to do their work and provide a service because of the behaviour of the complainant. We have a policy in place for when these standards are not met which is our Code of Practice on Unacceptable Behaviour.
- 1.4.4 We recognise that people may act out of character in times of trouble or distress. Sometimes a health condition or a disability can affect how a person expresses themselves. The circumstances leading to a complaint may also result in the complainant acting in an unacceptable way.
- 1.4.5 People who have a history of challenging or inappropriate actions, or have difficulty expressing themselves, may still have a legitimate grievance, and we will treat all complaints seriously. However, we also recognise that the actions of some complainants may result in unreasonable demands on time and resources or unacceptable behaviour towards our staff. We will, therefore, apply our policies and procedures to protect staff from unacceptable actions such as unreasonable persistence, threats or offensive behaviour from complainants.
- 1.4.6 The manner in which the University deals with unacceptable behaviour will depend on the nature and extent of the behaviour. This may range from asking the person to modify their behaviour or restricting contact with them, to invoking its disciplinary and conduct procedures or, in the most serious cases, the involvement of the police.
- 1.4.7 Where we decide to restrict access to a complainant under the terms of our policy, we have a procedure in place to communicate that decision, notify the complainant of their right of appeal, and review any decision to restrict contact with us. This is outlined in our [Code of Practice on Unacceptable Behaviour](#).
- 1.4.8 If we decide to restrict a complainant's contact, we will be careful to follow the process set out in our policy and to minimise any restrictions on the complainant's access to the complaints process. We will normally continue investigating a complaint even where contact restrictions are in place (for example, limiting communication to letter or to a named staff member). In some cases, it may be possible to continue investigating the complaint without contact from the complainant. Our policy allows us in limited circumstances to restrict access to the complaint process entirely. This would be as a last resort, should be as limited as possible (for a limited time, or about a limited set of subjects) and requires manager approval. Where access to the complaint process is restricted, we signpost the complainant to the SPSO (see Part 3: Signposting to the SPSO).

1.4.9 The SPSO has [guidance on promoting positive behaviour and managing unacceptable actions](#).

1.5 Maintaining confidentiality and data protection

1.5.1 Confidentiality is important in complaints handling. This includes maintaining the complainant's confidentiality and confidentiality in relation to information about staff members, contractors or any third parties involved in the complaint.

1.5.2 This should not prevent us from being open and transparent, as far as possible, in how we handle complaints. This includes sharing as much information with the complainant (and, where appropriate, any affected staff members) as we can. When sharing information, we should be clear about why the information is being shared and our expectations on how the recipient will use the information.

1.5.3 We always bear in mind legal requirements, for example data protection legislation, as well as internal policies on confidentiality and the use of individuals' information.

[LINK TO PRIVACY POLICY](#)

1.5.4 Examples of situations where a response to a complaint may be limited by confidentiality, such as:

- where a complaint has been raised against a staff member and has been upheld – we will advise the complainant that their complaint is upheld, but would not share specific details affecting staff members, particularly where disciplinary action is taken.
- where someone has raised a concern about a child or an adult's safety and is unhappy about how that has been dealt with – we would look into this to check whether the safety concern had been properly dealt with, but we would not share any details of our findings in relation to the safety concern.

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Part 2: When to use this procedure

2.1 What is a complaint?

2.1.1 The University of Glasgow's definition of a complaint is: 'an expression of dissatisfaction by one or more students, other service users and members of the public about the University of Glasgow's action or lack of action, or about the standard of service provided by or on behalf of the University of Glasgow.'

2.1.2 For clarity, where an employee also receives a service from the University of Glasgow as a member of the public (e.g. if they are also a registered student, an applicant, or a member of University of Glasgow Sport), they may complain about that service. If a member of staff wishes to complain about something relating to their employment, they should contact their line manager or Human Resources.

2.1.3 A complaint may relate to the following, but is not restricted to this list:

- failure or refusal to provide a service
- inadequate quality or standard of service, or an unreasonable delay in providing a service
- the quality of facilities or learning resources
- dissatisfaction with one of our policies or its impact on the individual (although it is recognised that policy is set at the discretion of the institution)
- failure to properly apply law, procedure or guidance when delivering services
- failure to follow the appropriate administrative process
- conduct, treatment by or attitude of a member of staff or contractor¹, (**except** where there are arrangements in place for the contractor to handle the complaint themselves: see **Complaints about contracted services**); or
- disagreement with a decision, (**except** where there is a statutory procedure for challenging that decision, or an established appeals process followed throughout the sector).

2.1.4 A complaint **is not**:

- a request for information or an explanation of policy or practice
- a response to an invitation to provide feedback through a formal mechanism such as a questionnaire or committee membership
- a concern about student conduct (see **Complaints and student conduct procedures**)
- a routine first-time request for a service (see **Complaints and service requests**)
- a request for compensation only (see **Complaints and compensation claims**)
- an insurance claim
- issues that are in court or have already been heard by a court or a tribunal (see **Complaints and legal action**)
- disagreement with a decision where there is a statutory procedure for challenging that decision (such as for freedom of information and subject access requests), or

¹ Information on harassment and bullying is provided in the Dignity at Work and Study Policy.

<https://www.gla.ac.uk/myglasgow/humanresources/equalitydiversity/dignityworkstudyover/>



an established appeals process followed throughout the sector (such as an appeal about an academic decision on assessment or admission - see **Complaints and appeals**)

- a request for information under the Data Protection or Freedom of Information (Scotland) Acts, or the Environmental Information Regulations
- a grievance by a staff member or a grievance relating to employment or staff recruitment
- a concern raised internally by a member of staff (which was not about a service they received, such as a whistleblowing concern)
- concerns about services outwith the institution's delegated responsibilities (e.g. conference and accommodation services to commercial clients)
- a concern about a child or an adult's safety
- an attempt to reopen a previously concluded complaint or to have a complaint reconsidered where we have already given our final decision
- abuse or unsubstantiated allegations about our institution or staff where such actions would be covered by our Code of Practice on Unacceptable Behaviour; or
- a concern about the actions or service of a different organisation, where we have no involvement in the issue (**except** where the other organisation is delivering services on our behalf: see **Complaints about contracted services**).

2.1.5 We will not treat these issues as complaints, and will instead direct people to use the appropriate procedures. Some situations can involve a combination of issues, where some are complaints and others are not, and each situation should be assessed on a case-by-case basis.

2.1.6 If a matter is not a complaint, or not suitable to be handled under the CHP, we will explain this to the complainant, and tell them what (if any) action we will take, and why. See **What if the CHP does not apply**.

2.2 Who can make a complaint?

2.2.1 Anyone who receives, requests, or is affected by our services can make a complaint.

2.2.2 This includes, although is not limited to:

- a student's experience during their time at the institution (all referred to as 'students' through the remainder of this document);
- members of the public, where they have a complaint about matters which are (or which were at the time the issue arose) the responsibility of the institution; and
- members of the public who are applying for admission to the institution and whose complaint does not relate to academic judgement.

2.2.3 The basic processes for investigating complaints are the same for students, members of the public and applicants to the institution – however appeals/complaints regarding a decision not to admit an applicant will be dealt with through admissions procedures.

2.2.4 We also accept complaints from the representative of a person who is dissatisfied with our service. See **Complaints by (or about) a third party**.

Supporting the complainant

2.2.5 Everyone has the right to equal access to our complaints procedure. It is important to recognise the barriers that some people may face complaining. These may be physical, sensory, communication or language barriers, but can also include their anxieties and concerns. Complainants may need support to overcome these barriers.

2.2.6 We have legal duties to make our complaints service accessible under equalities and mental health legislation. For example:

- the Equality Act (Scotland) 2010 – this gives people with a protected characteristic the right to reasonable adjustments to access our services (such as large print or BSL translations of information); and
- the Mental Health (Care and Treatment) (Scotland) Act 2003 – this gives anyone with a ‘mental disorder’ (including mental health issues, learning difficulties, dementia and autism) a right to access independent advocacy. This must be delivered by independent organisations that only provide advocacy. They help people to know and understand their rights, make informed decisions and have a voice.

2.2.7 Examples of how we will meet our legal duties are:

- proactively checking whether members of the public who contact us require additional support to access our services
- providing interpretation and/or translation services for British Sign Language users; and
- helping complainants access independent advocacy (the Scottish Independent Advocacy Alliance website has information about local advocacy organisations throughout Scotland).

2.2.8 In addition to our legal duties, we will seek to ensure that we support vulnerable groups in accessing our complaints procedure. Actions that we may take include:

- helping vulnerable people identify when they might wish to make a complaint (for example, by training frontline staff who provide services to vulnerable groups)
- helping complainants access independent support or advocacy to help them understand their rights and communicate their complaints (for example, through the SRC Advice Centre, the Scottish Independent Advocacy Alliance or Citizen’s Advice Scotland); and
- providing a neutral point of contact for complaints (where the relationship between complainants and frontline staff is significant and ongoing).

2.2.9 These lists are not exhaustive, and we will always take into account our commitment and responsibilities to equality and accessibility.

2.3 How complaints may be made

2.3.1 Complaints may be made verbally or in writing, including face-to-face, by phone, letter or email.

- 2.3.2 Where a complaint is made **verbally**, we will make a record of the key points of complaint raised.

Where it is clear that a complex complaint will be immediately considered at stage 2 (investigation), it may be helpful to complete a complaint form with the complainant's input to ensure full details of the complaint are documented. However, there is no requirement for the person to complete a complaint form, and it is important that the completion of a complaint form does not present a barrier to people complaining.

Complaint via digital platforms or social media

- 2.3.3 Complaint issues may also be raised on **digital platforms** (including **social media**).
- 2.3.4 Where a complaint issue is raised via a digital channel managed and controlled by the University of Glasgow (for example an official Twitter address or Facebook page), we will explain that we do not take complaints on social media, but we will tell the person how they can complain.
- 2.2.5 We will always be mindful of our data protection obligations when responding to issues online or in a public forum. See **Part 1: Maintaining confidentiality and data protection**.

2.3 Time limit for making complaints

- 2.4.1 The complainant should raise their complaint within six months of when they first knew of the problem, unless there are special circumstances for considering complaints beyond this time (for example, where a person was not able to complain due to serious illness or recent bereavement).
- 2.4.2 Where a complainant has received a stage 1 response, and wishes to escalate to stage 2, unless there are special circumstances they must request this either:
- within six months of when they first knew of the problem; or
 - within two months of receiving their stage 1 response (if this is later).
- 2.4.3 We will apply these time limits with discretion, taking into account the seriousness of the issue, the availability of relevant records and staff involved, how long ago the events occurred, and the likelihood that an investigation will lead to a practical benefit for the complainant or useful learning for the institution.
- 2.4.4 We will also take account of the time limit within which a member of the public can ask the SPSO to consider complaints (normally one year). The SPSO have discretion to waive this time limit in special circumstances (and may consider doing so in cases where we have waived our own time limit).

2.5 Particular circumstances

Complaints by (or about) a third party

- 2.5.1 Sometimes a complainant may be unable or reluctant to make a complaint on their own. We will accept complaints from third parties, which may include relatives, friends, advocates and advisers. Where a complaint is made on behalf of a complainant, we must ensure that the complainant has authorised the person to act on their behalf. It is good practice to ensure the complainant understands their personal information will be shared as part of the complaints handling process (particularly where this includes sensitive personal information). This can include complaints brought by parents on behalf of their child, if the child is considered to have capacity to make decisions for themselves.
- 2.5.2 The giving of personal consent usually means that the individual affected must give clear written authority for the third party to act on their behalf, acknowledging that in designating them to do this we will disclose details of any matter pertaining to the complaint to them. For our students, we will accept an email from their University of Glasgow email address outlining this. If we consider it is appropriate we can take verbal consent direct from the complainant to deal with a third party and would normally follow up in writing to confirm this.
- 2.5.3 In certain circumstances, a person may raise a complaint involving another person's personal data, without receiving consent. The complaint should still be investigated where possible, but the investigation and response may be limited by considerations of confidentiality. The person who submitted the complaint should be made aware of these limitations and the effect this will have on the scope of the response.
- 2.5.4 See also **Part 1: Maintaining confidentiality and data protection**.

Serious, high-risk or high-profile complaints

- 2.5.5 We will take particular care to identify complaints 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. Serious, high-risk or high-profile complaints should normally be handled immediately at stage 2 (see **Part 3: Stage 2: Investigation**).
- 2.5.6 We define potential high-risk or high-profile complaints as those that may:
- involve a death or terminal illness
 - involve serious service failure, for example major delays in service provision or repeated failures to provide a service
 - generate significant and on-going press interest
 - pose a serious operational risk to the Institution; or
 - present issues of a highly sensitive nature.

Anonymous complaints

- 2.5.7 We value all complaints, including anonymous complaints, and will take action to consider them further wherever this is appropriate. Generally, we will consider anonymous complaints if there is enough information in the complaint to enable us to make further enquiries. Any decision not to pursue an anonymous complaint must be taken by the Complaints Resolution Office and or an appropriate manager.
- 2.5.8 If we pursue an anonymous complaint further, we will record it as an anonymous complaint together with any learning from the complaint and action taken.
- 2.5.9 If an anonymous complainant makes serious allegations, these should be dealt with in a timely manner under relevant procedures. This may not be the complaints procedure and could instead be relevant child protection, adult protection or disciplinary procedures.

What if the person does not want to complain?

- 2.5.10 If someone has expressed dissatisfaction in line with our definition of a complaint but does not want to complain, we will explain that complaints offer us the opportunity to improve services where things have gone wrong. We will encourage them to submit their complaint and allow us to handle it through the CHP. This will ensure they are updated on the action taken and get a response to their complaint.
- 2.5.11 If the person insists they do not wish to complain, we are not required to progress the complaint under this procedure. However, we should record the complaint as an anonymous complaint (including minimal information about the complaint, without any identifying information) to enable us to track trends and themes in complaints. Where the complaint is serious, or there is evidence of a problem with our services, we should also look into the matter to remedy this (and record any outcome).

Complaints involving more than one area or organisation

- 2.5.12 If a complaint relates to the actions of two or more departments / faculties / schools, we will tell the complainant who will take the lead in dealing with the complaint, and explain that they will get only one response covering all issues raised. The nature of the complaint may also require parallel procedures to be initiated (such as academic appeal or disciplinary procedures). See **Complaints and appeals**.
- 2.5.13 If we receive a complaint about the service of another organisation or public service provider, but we have no involvement in the issue, the complainant should be advised to contact the appropriate organisation directly.
- 2.5.14 If a complaint relates to our service and the service of another organisation or public service provider, and we have a direct interest in the issue, we will handle the complaint about the University of Glasgow through the CHP. If we need to contact an outside body about the complaint, we will be mindful of data protection. See **Part 1: Maintaining confidentiality and data protection**.
- 2.5.15 Such complaints may include, for example:

- a complaint made in relation to provision of third-party services, for example IT systems
- a complaint made about a service that is contracted out, such as catering services; or
- a complaint made to the institution about a student loan where the dissatisfaction relates to the service we have provided and the service the Student Awards Agency for Scotland has provided.

Complaints about contracted services

2.5.16 Where we use a contractor to deliver a service on our behalf we recognise that we remain responsible and accountable for ensuring that the services provided meet the University of Glasgow's standard (including in relation to complaints). We will either do so by:

- ensuring the contractor complies with this procedure; or
- ensuring the contractor has their own procedure in place, which fully meets the standards in this procedure. At the end of the investigation stage of any such complaints the contractor will ensure that the complainant is signposted to the SPSO.

2.5.17 We will confirm that service users are clearly informed of the process and understand how to complain. We will also ensure that there is appropriate provision for information sharing and governance oversight where required.

2.5.18 The University of Glasgow has discretion to investigate complaints about organisations contracted to deliver services on its behalf even where the procedure has normally been delegated.

Complaints about senior staff

2.5.19 Complaints about senior staff can be difficult to handle, as there may be a conflict of interest for the staff investigating the complaint. When serious complaints are raised against senior staff, it is particularly important that the investigation is conducted by an individual who is independent of the situation. We will ensure we have strong governance arrangements in place that set out clear procedures for handling such complaints.

Complaints and other processes

2.5.20 Complaints can sometimes be confused (or overlap) with other processes, such as disciplinary or whistleblowing processes. Specific examples and guidance on how to handle these are below.

Complaints and appeals

2.5.21 In some cases, an issue may be raised as a complaint which should be considered under alternative arrangements (for example, an academic appeal or fitness to practise

appeal), or vice versa. Complaints and appeals are handled under separate processes. It is not appropriate for the same issue to be considered under both procedures. A challenge to an academic judgement or an appeal against a decision concerning progress, assessment or award is not a complaint. However, if there are concerns about the quality of supervision or teaching which the complainant considers contributed to a failure to achieve a required academic standard, these aspects should be considered under the Complaints Handling Procedure.

- 2.5.22 Where the complaint and appeal issues can be clearly distinguished, we will identify the points to be investigated as a complaint and progress those in line with this procedure. This will include confirming the points of complaint and outcomes sought. We will also identify and set out the issues of appeal.
- 2.5.23 In determining which process applies, we may need to clarify our approach with the complainant (for example, where the complainant is focussed solely on the appeal outcome they may not wish to also pursue a complaint). However, we will not normally ask the complainant to resubmit issues they have already raised (for example, to reframe part of their appeal as a complaint).
- 2.5.24 We may also decide to complete consideration under one procedure before considering residual issues under another procedure (for example, we may delay consideration of any complaint until the academic appeal has been concluded, or vice versa). This would normally only be appropriate where it is difficult to distinguish which issues should be dealt with under which procedure.
- 2.5.25 In all cases, we will explain to the student which issues have been considered under which process, and signpost them to the appropriate independent review.

Complaints and student conduct procedures

- 2.5.26 A concern about the conduct of another student is not a complaint, and should be handled under the Code of Student Conduct. However, the person may wish to complain about how the University of Glasgow handled the situation (for example, where a teacher allowed a student's behaviour to disrupt a class or exam). Where the complaint is about our service, we will consider it under the CHP.

Complaints and service requests

- 2.5.27 If someone asks the University of Glasgow to do something (for example, provide a service or deal with a problem), and this is the first time they have contacted us, this would normally be a routine service request and not a complaint.
- 2.5.28 Service requests can lead to complaints, if the request is not handled promptly or the person is then dissatisfied with how we provide the service.

Complaints and staff disciplinary or whistleblowing processes

- 2.5.29 The University is committed to protecting the dignity of students, staff and visitors in their interactions with others.

<https://www.gla.ac.uk/myglasgow/humanresources/equalitydiversity/dignityworkstudyover/>

- 2.5.30 Concerns raised by students regarding conduct of staff may lead to different formal processes, such as the University's Grievance or Disciplinary procedures.
- 2.5.31 If the issues raised in a complaint overlap with issues raised under a staff disciplinary or whistleblowing process, we still need to respond to the complaint.
- 2.5.32 Our response will be careful not to share confidential information (such as anything about the whistleblowing or disciplinary procedures, or outcomes for individual staff members). It should focus on whether the University of Glasgow failed to meet our expected standards and what we have done to improve things, in general terms.
- 2.5.33 Staff investigating such complaints should take extra care to ensure that:
- we comply with all requirements of the CHP in relation to the complaint (as well as meeting the requirements of the other processes)
 - all complaint issues are addressed (sometimes issues can get missed if they are not also relevant to the overlapping process); and
 - we keep records of the investigation that can be made available to the SPSO if required. This can be problematic when the other process is confidential, because SPSO will normally require documentation of any correspondence and interviews to show how conclusions were reached. We will need to bear this in mind when planning any elements of the investigation that might overlap (for example, if staff are interviewed for the purposes of both the complaint and a disciplinary procedure, they should not be assured that any evidence given will be confidential, as it may be made available to the SPSO).
- 2.5.34 The SPSO's report [Making complaints work for everyone](#) has more information on supporting staff who are the subject of complaints.

Contact from MPs, MSPs or Councillors

- 2.5.35 Complaints are sometimes brought by or on behalf of complainants by elected members (see complaints raised by third parties). Where a matter is being dealt with as a complaint, it will be handled in line with this CHP. Sometimes enquiries are made by elected members (on behalf of constituents). The Information Commissioner's Office has guidance on elected members in relation to seeking third party consent: <https://ico.org.uk/media/for-organisations/documents/1432063/constituency-casework-of-mps-and-the-processing-of-sensitive-personal-data.pdf>.

Complaints and compensation claims

- 2.5.36 Where someone is seeking financial compensation only, this is not a complaint. However, in some cases the person may want to complain about the matter leading to their financial claim, and they may seek additional outcomes, such as an apology or an explanation. Where appropriate, we may consider that matter as a complaint, but deal with the financial claim separately. It may be appropriate to extend the timeframes for responding to the complaint, to consider the financial claim first.

Complaints and legal action

- 2.5.37 Where a complainant says that legal action is being actively pursued, this is not a complaint.
- 2.5.38 Where a complainant indicates that they are thinking about legal action, but have not yet commenced this, they should be informed that if they take such action, they should notify the Complaints Resolution Office and that the complaints process, in relation to the matters that will be considered through the legal process, will be closed. Any outstanding complaints will still be addressed through the CHP.
- 2.5.39 If an issue has been, or is being, considered by a court, we will not consider the same issue under the CHP.

What to do if the CHP does not apply

- 2.5.40 If the issue does not meet the definition of a complaint or if it is not appropriate to handle it under this procedure (for example, due to time limits), we will explain to the complainant why we have made this decision. We will also tell them what action (if any) we will take (for example, if another procedure applies), and advise them of their right to contact the SPSO if they disagree with our decision not to respond to the issue as a complaint.
- 2.5.41 Where a complainant continues to contact us about the same issue, we will explain that we have already given them our final response on the matter and signpost them to the SPSO. We may also consider whether we need to take action under our Code of Unacceptable Behaviour.

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Part 3: The complaints handling process

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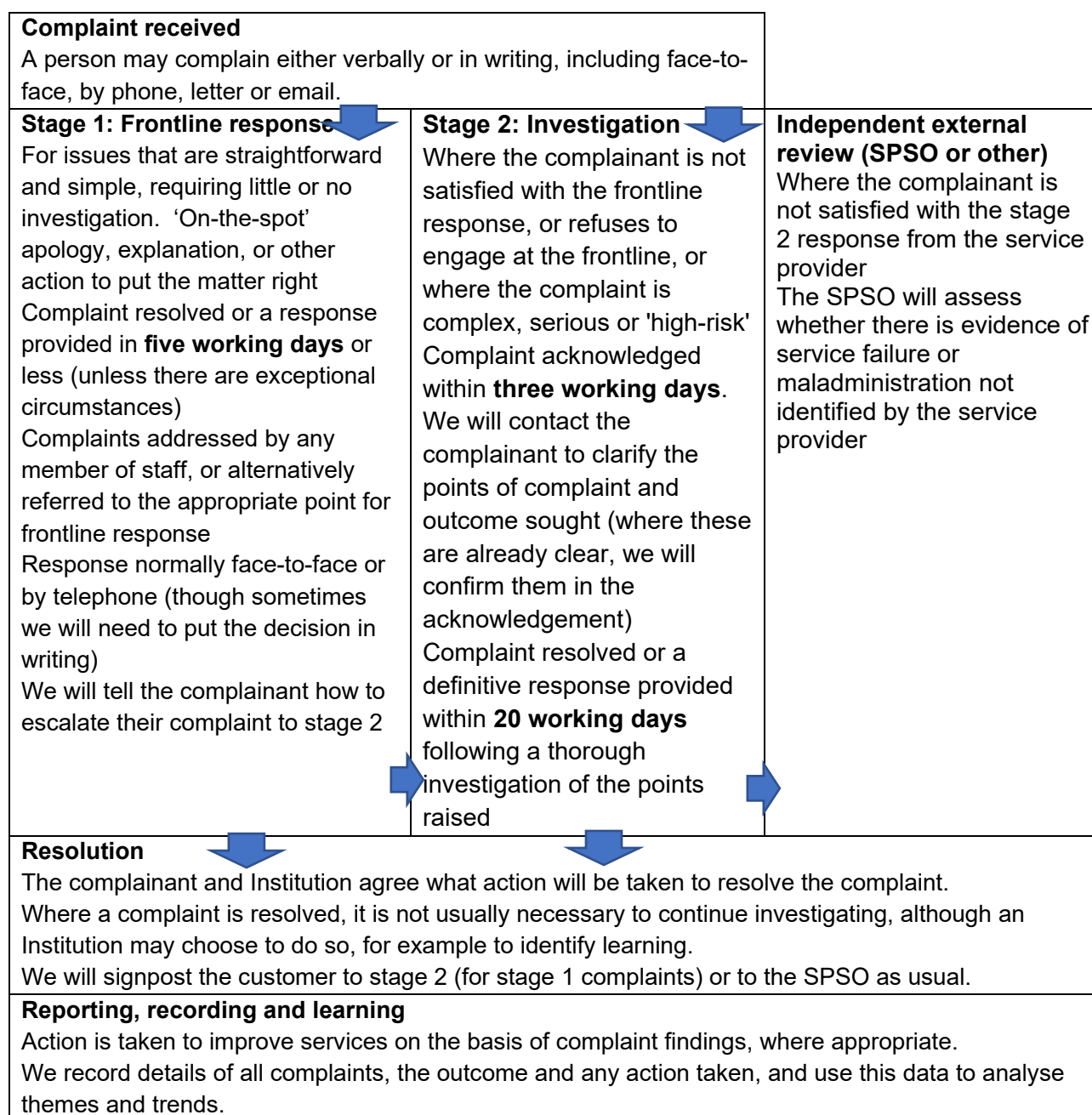


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Part 3: The complaints handling process

3.1 The complaints handling process

3.1.1 Our Complaints Handling Procedure (CHP) aims to provide a quick, simple and streamlined process for responding to complaints early and locally by capable, well-trained staff. Where possible, we will **resolve** the complaint to the complainant's satisfaction. Where this is not possible, we will give the complainant a clear and reasoned response to their complaint.



Senior management have an active interest in complaints and use complaints data and analysis to improve services.
Learning is shared throughout the Institution.

3.2 Resolving the complaint

- 3.2.1 A complaint is **resolved** when both the University of Glasgow and the complainant agree what action (if any) will be taken to provide full and final resolution for the complainant, without making a decision about whether the complaint is upheld or not upheld.
- 3.2.2 We will try to resolve complaints wherever possible, although we accept this will not be possible in all cases.
- 3.2.3 A complaint may be resolved at any point in the complaint handling process, including during the investigation stage. It is particularly important to try to resolve complaints where there is an ongoing relationship with the complainant or where the complaint relates to an ongoing issue that may give rise to future complaints if the matter is not fully resolved.
- 3.2.4 It may be helpful to use alternative complaint resolution approaches when trying to resolve a complaint. See **Alternative complaint resolution approaches**.
- 3.2.5 Where a complaint is resolved, we do not normally need to continue looking into it or provide a response on all points of complaint. There will be a clear record of how the complaint was resolved, what action was agreed, and the complainant's agreement to this as a final outcome. In some cases it may still be appropriate to continue looking into the issue, for example where there is evidence of a wider problem or potential for useful learning. We will use our professional judgment in deciding whether it is appropriate to continue looking into a complaint that is resolved.
- 3.2.6 In all cases, we will record the complaint outcome (resolved) and any action taken, and signpost the complainant to stage 2 (for stage 1 complaints) or to the SPSO as usual (see **Signposting to the SPSO**).
- 3.2.7 If we are not able to agree a resolution with the complainant, we will follow this CHP to provide a clear and reasoned response to each of the issues raised.

3.3 What happens when we receive a complaint?

- 3.3.1 Members of staff receiving a complaint should consider four key questions. This will help them to either respond to the complaint quickly (at stage 1) or determine whether the complaint is more suitable for stage 2:

What exactly is the complaint (or complaints)?

- 3.3.2 It is important to be clear exactly what the complaint is about. We may need to ask the complainant for more information and probe further to get a full understanding.
- 3.3.3 We will need to decide whether the issue can be defined as a complaint and whether there are circumstances that may limit our ability to respond to the complaint (such as the time limit for making complaints, confidentiality, anonymity or the need for consent). We should also consider whether the complaint is serious, high-risk or high-profile.
- 3.3.4 If the matter is not suitable for handling as a complaint, we will explain this to the complainant (and signpost them to SPSO). There is detailed guidance on this step in **Part 2: When to use this procedure**.
- 3.3.5 In most cases, this step will be straightforward. If it is not, the complaint may need to be handled immediately at stage 2 (see **Stage 2: Investigation**).

What does the complainant want to achieve by complaining?

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

Can I achieve this, or explain why not?

- 3.3.7 If a staff member handling a complaint can achieve the expected outcome, for example by providing an on-the-spot apology or explain why they cannot achieve it, they should do so.
- 3.3.8 The complainant may expect more than we can provide. If so, we will tell them as soon as possible.
- 3.3.9 Complaints which can be resolved or responded to quickly should be managed at stage 1 (see **Stage 1: Frontline response**).

If I cannot respond, who can help?

- 3.3.10 If the complaint is simple and straightforward, but the staff member receiving the complaint cannot deal with it because, for example, they are unfamiliar with the issues or area of service involved, they should pass the complaint to someone who can respond quickly. If you need guidance or advice about a complaint, contact the Complaints Resolution Office: complaints@glasgow.ac.uk.
- 3.3.11 If it is not a simple and straightforward complaint that can realistically be closed within five working days (or ten, if an extension is appropriate), it should be handled immediately at stage 2. If the complainant refuses to engage at stage 1, insisting that they want their complaint investigated, it should be handled immediately at stage 2. See **Stage 2: Investigation**.

3.4 Stage 1: Frontline response

- 3.4.1 Frontline response aims to respond quickly (within five working days) to straightforward complaints that require little or no investigation.
- 3.4.2 Any member of staff may deal with complaints at this stage (including the staff member complained about, for example with an explanation or apology). The main principle is to respond to complaints at the earliest opportunity and as close to the point of service delivery as possible.
- 3.4.3 We may respond to the complaint 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. We may also explain that, as an organisation that values complaints, we may use the information given when we review service standards in the future. If we consider an apology is appropriate, we will consider the [SPSO guidance on apology](#).
- 3.4.4 Complaints which are not suitable for frontline response should be identified early and handled immediately at stage 2: investigation.

Notifying staff members involved

- 3.4.5 If the complaint is about the actions of another staff member, the complaint should be shared with them, where possible, before responding (although this should not prevent us responding to the complaint quickly, for example where it is clear that an apology is warranted).

Timelines

- 3.4.6 Frontline response must be completed within **five working days**, although in practice we would often expect to respond to the complaint much sooner. 'Day one' is always the date of receipt of the complaint (or the next working day if the complaint is received after 4pm, on a weekend or public holiday). Academic holidays should be counted as normal working days (except for weekends or public holidays and closure days¹).

Extension to the timeline

- 3.4.7 In exceptional circumstances, a short extension of time may be necessary due to unforeseen circumstances (such as the availability of a key staff member). Extensions must be agreed with the Complaints Resolution Office. We will tell the complainant about the reasons for the extension, and when they can expect a response. The maximum extension that can be granted is five working days (that is, no more than **ten working days** in total from the date of receipt).
- 3.4.8 Where clarification or consent is required in order for us to process the complaint, in line with the CHP, the timeframe for responding will start on the day this is received.

¹ [link to public holidays dates]

3.4.9 If a complaint will take more than five working days to look into, it should be handled at stage 2 immediately. The only exception to this is where the complaint is simple and could normally be handled within five working days, but it is not possible to begin immediately (for example, due to the absence of a key staff member). In such cases, the complaint may still be handled at stage 1 if it is clear that it can be handled within the extended timeframe of up to ten working days.

3.4.10 If a complaint has not been closed within ten working days, it should be escalated to stage 2 for a final response.

3.4.11 **Appendix 1** provides further information on timelines.

Closing the complaint at the frontline response stage

3.4.12 If we convey the decision face-to-face or on the telephone, we are not required to write to the complainant as well, although in most cases a brief summary of any action/resolution will be provided.

3.4.13 We will:

- tell the complainant the outcome of the complaint (whether it is resolved, upheld, partially upheld or not upheld)
- explain the reasons for our decision (or the agreed action taken to resolve the complaint; see **Resolving the complaint**); and
- explain that the complainant can escalate the complaint to stage 2 if they remain dissatisfied and how to do so (we should not signpost to the SPSO until the complainant has completed stage 2).

3.4.14 We will keep a full and accurate record of the decision given to the complainant. If we are not able to contact the complainant by phone, or speak to them in person, we will provide a written response to the complaint where an email or postal address is provided, covering the points above.

3.4.15 If the complaint is about the actions of a particular staff member/s, we will share with them any part of the complaint response which relates to them, (unless there are compelling reasons not to).

3.4.16 The complaint should then be closed and the complaints system updated accordingly.

3.4.17 At the earliest opportunity after the closure of the complaint, the staff member/team handling the complaint should consider whether any learning has been identified. See **Part 4: Learning from complaints**.

3.5 Stage 2: Investigation

3.5.1 Not all complaints are suitable for frontline response and not all complaints will be satisfactorily addressed at that stage. Stage 2 is appropriate where:

- the complainant is dissatisfied with the frontline response or refuses to engage at the frontline stage, insisting they wish their complaint to be investigated. Unless

exceptional circumstances apply, the complainant must escalate the complaint within six months of when they first knew of the problem or within two months of the stage 1 response, whichever is later (see **Part 2: Time limits for making a complaint**)

- the complaint is not simple and straightforward (for example where the complainant has raised a number of issues, or where information from several sources is needed before we can establish what happened and/or what should have happened); or
- the complaint relates to serious, high-risk or high-profile issues (see **Part 2: Serious, high-risk or high-profile complaints**).

3.5.2 An investigation aims to explore the complaint in more depth and establish all the relevant facts. The aim is to resolve the complaint where possible, or to give the complainant a full, objective and proportionate response that represents our final position. Wherever possible, complaints should be investigated by someone not involved in the complaint. Stage 2 complaints are managed by and normally investigated by the Complaints Resolution Office.

3.5.3 Details of the complaint will be recorded on the complaints system. Where appropriate, this will be done as a continuation of frontline response. If the investigation stage follows a frontline response, the officer responsible for the investigation should have access to all case notes and associated information.

3.5.4 At the beginning of stage 2 we will consider whether complaint resolution approaches other than investigation may be helpful (see **Alternative complaint resolution approaches**).

Acknowledging the complaint

3.5.5 Complaints will be acknowledged within three working days of receipt at stage 2.

3.5.6 We will issue the acknowledgement in a format which is accessible to the complainant, taking into account their preferred method of contact, where specified.

3.5.7 Where the points of complaint and expected outcomes are clear from the complaint, we will set these out in the acknowledgement and ask the complainant to get in touch with us immediately if they disagree. See **Agreeing the points of complaint and outcome sought**.

3.5.8 Where the points of complaint and expected outcomes are not clear, we will contact the complainant to seek clarification.

Agreeing the points of complaint and outcome sought

3.5.9 It is important to be clear from the start of stage 2 about the points of complaint to be investigated and what outcome the complainant is seeking. We may also need to manage the complainant's expectations about the scope of our investigation.

3.5.10 Where the points of complaint and outcome sought are clear, we can confirm our understanding of these with the complainant when acknowledging the complaint (see **Acknowledging the complaint**).

3.5.11 Where the points of complaint and outcome sought are not clear, we will contact the complainant to confirm these. We will normally need to speak to the complainant (by phone or face-to-face) to do this effectively. In some cases, it may be possible to clarify complaints in writing. The key point is that we need to be sure we and the complainant have a shared understanding of the complaint. When contacting the complainant, we will be respectful of their stated preferred method of contact. We should keep a clear record of any discussion with the complainant.

3.5.12 In all cases, we must have a clear shared understanding of:

What are the points of complaint to be investigated?

3.5.13 While the complaint may appear to be clear, agreeing the points of complaint at the outset ensures there is a shared understanding and avoids the complaint changing or confusion arising at a later stage. The points of complaint should be specific enough to direct the investigation, but broad enough to include any multiple and specific points of concern about the same issue.

3.5.14 We will make every effort to agree the points of complaint with the complainant (alternative complaint resolution approaches may be helpful at this stage). In very rare cases, it may not be possible to agree the points of complaint (for example, if the complainant insists on an unreasonably large number of complaints being separately investigated, or on framing their complaint in an abusive way). We will manage any such cases in accordance with our Code of Practice on Unacceptable Behaviour, bearing in mind that we should continue to investigate the complaint (as we understand it) wherever possible.

Is there anything we can't consider under the CHP?

3.5.15 We will explain if there are any points that are not suitable for handling under the CHP (see Part 2: What to do if the CHP does not apply).

What outcome does the complainant want to achieve?

3.5.16 Asking what outcome the complainant is seeking helps direct the investigation and enables us to focus on resolving the complaint where possible.

Are the complainant's expectations realistic and achievable?

3.5.17 It may be that the complainant expects more than we can provide, or has unrealistic expectations about the scope of the investigation. If so, we should make this clear to the complainant as soon as possible.

Notifying staff members involved

3.5.18 If the complaint is about the actions of a particular staff member/s, we will notify the staff member/s involved (including where the staff member is not named, but can be identified from the complaint).

3.5.19 We will:

- share the complaint information with the staff member/s (unless there are compelling reasons not to)
- advise them how the complaint will be handled, how they will be kept updated and how we will share the complaint response with them
- discuss their willingness to engage with alternative complaint resolution approaches (where applicable); and
- signpost the staff member/s to a contact person who can provide support (this must not be the person investigating or signing off the complaint response).
- information on what to expect from the complaint process is available from the Complaints Resolution Office.

3.5.20 If it is likely that internal disciplinary processes may be involved, the Complaints Resolution Office will work with colleagues in Human Resources to ensure that obligations under HR processes and the CHP are met. See also the section entitled

<https://www.gla.ac.uk/myglasgow/humanresources/mgrs-admin/employee/disciplinary/>

See also Part 2: Complaints and disciplinary or whistleblowing processes.

Investigating the complaint

3.5.21 It is important to plan the investigation before beginning. The staff member investigating the complaint should consider what information they have and what they need about:

- what happened? (this could include, for example, records of phone calls or meetings, work requests, recollections of staff members or internal emails)
- what should have happened? (this should include any relevant policies or procedures that apply); and
- is there a difference between what happened and what should have happened, and is the University of Glasgow responsible?

3.5.22 In some cases, information may not be readily available. We will balance the need for the information against the resources required to obtain it, taking into account the seriousness of the issue (for example, it may be appropriate to contact a former employee, if possible, where they hold key information about a serious complaint).

3.5.23 If we need to share information within or outwith the Institution, we will be mindful of our obligations under data protection legislation. See Part 1: Maintaining confidentiality and data protection.

Alternative complaint resolution approaches

- 3.5.24 Some complex complaints, or complaints where complainants and other interested parties have become entrenched in their position, may require a different approach to resolving the matter. Where we think it is appropriate, we may use alternative complaint resolution approaches such as complaint resolution discussions, mediation or conciliation to try to resolve the matter and to reduce the risk of the complaint escalating further. If mediation is attempted, a suitably trained and qualified mediator should be used. Alternative complaint resolution approaches may help both parties to understand what has caused the complaint, and so are more likely to lead to mutually satisfactory solutions.
- 3.5.25 Alternative complaint resolution approaches may be used to resolve the complaint entirely, or to support one part of the process, such as understanding the complaint, or exploring the complainant's desired outcome.
- 3.5.26 The SPSO has [guidance on alternative complaint resolution approaches](#)
- 3.5.27 If we and the complainant (and any staff members involved) agree to using alternative complaint resolution approaches, it is likely that an extension to the timeline will need to be agreed. This should not discourage the use of these approaches.

Meeting with the complainant during the investigation

- 3.5.28 To effectively investigate the complaint, it may be necessary to arrange a meeting with the complainant. Where a meeting takes place, we will always be mindful of the requirement to investigate complaints (including holding any meetings) within 20 working days wherever possible. Where there are difficulties arranging a meeting, this may provide grounds for extending the timeframe.
- 3.5.29 As a matter of good practice, a written record of the meeting should be completed and provided to the complainant. Alternatively, and by agreement with the person making the complaint, we may provide a record of the meeting in another format. We will notify the person making the complaint of the timescale within which we expect to provide the record of the meeting.

Timelines (Stage 2)

- 3.5.30 The following deadlines are appropriate to cases at the investigation stage (counting day one as the day of receipt, or the next working day if the complaint was received after 4pm, on a weekend or public holiday). Academic holidays should be counted as normal working days (except for weekends or public holidays and closure days).
- 3.5.31 Where clarification or consent is required in order for us to process the complaint, in line with the CHP, the timeframe for responding will start on the day this is received.
- Complaints will be acknowledged within **three working days**
 - a full response to the complaint should be provided as soon as possible but not later than **20 working days** from the time the complaint was received for investigation.

Extension to the timeline

3.5.32 Not all investigations will be able to meet this deadline. For example, some complaints are so complex that they require careful consideration and detailed investigation beyond the 20 working day timeline. It is important to be realistic and clear with the complainant about timeframes, and to advise them early if we think it will not be possible to meet the 20 day timeframe, and why. We should bear in mind that extended delays may have a detrimental effect on the complainant and will always try to avoid undue delays.

3.5.33 Any extension must be approved by an appropriate manager. We will keep the complainant and any member/s of staff complained about updated on the reason for the delay and give them a revised timescale for completion. We will contact the complainant and any member/s of staff complained about at least once every 20 working days to update them on the progress of the investigation.

3.5.34 The reasons for an extension might include the following:

- the volume of documentation to be considered, number of responses to the complaint to be obtained),
- essential accounts or statements, crucial to establishing the circumstances of the case, are needed from staff or others but the person is not available because of long-term sickness or leave
- we cannot obtain further essential information within normal timescales; or
- the complainant has agreed to alternative complaint resolution approaches as a potential route for resolution.

These are only a few examples, and we will judge the matter in relation to each complaint. However, an extension would be the exception.

3.5.35 **Appendix 1** provides further information on timelines.

Closing the complaint at the investigation stage

3.5.36 The response to the complaint should be in writing (or by the complainant's preferred method of contact) and must be signed off by a manager or officer who is empowered to provide the final response on behalf of the University of Glasgow. Normally this sign off will be by the Executive Director of Student and Academic Services, or Chief Operating Officer.

3.5.37 We will tell the complainant the outcome of the complaint (whether it is resolved, upheld, partially upheld or not upheld). We aim to ensure responses to complaints:

- are clear and easy to understand, written in a way that is person-centred and non-confrontational
- avoid technical terms, but where these must be used, an explanation of the term should be provided
- address all the issues raised and demonstrate that each element has been fully and fairly investigated
- include an apology where things have gone wrong (this is different to an expression of empathy: see [the SPSO's guidance on apology](#))

- highlight any area of disagreement and explain why no further action can be taken
- indicate that a named member of staff is available to clarify any aspect of the letter; and
- indicate that if they are not satisfied with the outcome of the local process, they may seek a review by the SPSO (see **Signposting to the SPSO**).

3.5.38 Where a complaint has been **resolved**, the response does not need to provide a decision on all points of complaint but should instead confirm the resolution agreed. See **Resolving the complaint**.

3.5.39 If the complaint is about the actions of a particular staff member/s, we will share with them any part of the complaint response which relates to them, (unless there are compelling reasons not to).

3.5.40 We will record the decision, and details of how it was communicated to the complainant, on the complaints system.

3.5.41 At the earliest opportunity after the closure of the complaint, the staff member handling the complaint should consider whether any learning has been identified. See **Part 4: Learning from complaints**.

3.6 Signposting to the SPSO

3.6.1 Once the investigation stage has been completed, the complainant has the right to approach the SPSO if they remain dissatisfied. We will make clear to the complainant:

- their right to ask the SPSO to consider the complaint
- the time limit for doing so; and
- how to contact the SPSO.

3.6.2 The SPSO considers complaints from people who remain dissatisfied at the conclusion of our complaints procedure. The SPSO looks at issues such as service failure and maladministration (administrative fault), and the way we have handled the complaint. There are some subject areas that are outwith the SPSO's jurisdiction, but it is the SPSO's role to determine whether an individual complaint is one that they can consider (and to what extent). All investigation responses will be signpost to the SPSO.

3.6.3 The SPSO recommends that we use the wording in appendix 3 to inform complainants of their right to ask the SPSO to consider the complaint. This information should only be included in our final response to complaints.

3.7 Post-closure contact

3.7.1 If a complainant contacts us for clarification when they have received our final response, we may have further discussion with the complainant to clarify our response and answer their questions. However, if the complainant is dissatisfied with our response or does not accept our findings, we will explain that we have already given them our final response on the matter and signpost them to the SPSO.

The University of Glasgow Complaints Handling Procedure

Adapted from the Scottish Higher Education Model Complaints Handling Procedure as set out by the Scottish Public Service Ombudsman (SPSO)

Part 4: Governance

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Part 4: Governance

4.1 Roles and responsibilities

4.1.1 All staff will be aware of:

- the Complaints Handling Procedure (CHP)
- how to handle and record complaints at the frontline response stage
- who they can refer a complaint to, in case they are not able to handle the matter
- the need to try and resolve complaints early and as close to the point of service delivery as possible; and
- their clear authority to attempt to resolve any complaints they may be called upon to deal with.

4.1.2 Training on this procedure will be part of the induction process for all new staff. Refresher training will be provided for current staff on a regular basis.

4.1.3 Senior management will ensure that:

- The University of Glasgow's final position on a complaint investigation is signed off by an appropriate manager or officer in order to provide assurance that this is the definitive response of the University of Glasgow and that the complainant's concerns have been taken seriously
- it maintains overall responsibility and accountability for the management and governance of complaints handling (including complaints about contracted services)
- it has an active role in, and understanding of, the CHP (although not necessarily involved in the decision-making process of complaint handling)
- mechanisms are in place to ensure a consistent approach to the way complaints handling information is managed, monitored, reviewed and reported at all levels in [the Institution]; and
- complaints information is used to improve services, and this is evident from regular publications.

4.1.4 The Principal provides leadership and direction to the University. This includes ensuring that there is an effective Complaints Procedure with a robust investigation process which demonstrates that organisational learning is in place. The Principal may delegate responsibility for the procedure but must receive assurance of complaints performance by way of regular reporting. They should also ensure that complaints are used to identify service improvements, and that these improvements are implemented, and learning fed back to the wider organisation as appropriate.

4.1.5 The Principal provides leadership and direction in ways that guide and enable us to perform effectively across all services. This includes ensuring that there is an effective Complaints Handling Procedure, with a robust investigation process that demonstrates how we learn from the complaints we receive. The Principal may delegate responsibility for the CHP to senior staff. Regular management reports assure the Principal of the quality of complaints performance.

- 4.1.6 The Principal is also responsible for ensuring that there are governance and accountability arrangements in place in relation to complaints about contractors. This includes:
- ensuring performance monitoring for complaints is a feature of the service/management agreements between [the institution] and contractors
 - setting clear objectives in relation to this complaints procedure and putting appropriate monitoring systems in place to provide [the institution] with an overview of how the contractor is meeting its objectives
- 4.1.7 Executive Director of Student and Academic Services: As a senior officer they have delegated responsibility for complaints handling including responsible for signing response letters to complainants. They therefore must be satisfied that appropriate resolution has been reached and that the response addresses all aspects of the complaint the investigation is complete.
- 4.1.8 Heads of school/college/service: Will be involved in complaint resolution and may be involved in the local operational investigation and management of complaints handling. As senior officers they may be responsible for preparing and signing decision letters to complainants, so they should be satisfied that the investigation is complete and their response addresses all aspects of the complaint.
- 4.1.9 Complaints investigator: The complaints investigator is responsible and accountable for the management of the investigation. They may work as part of centralised team in the Complaints Resolution Office or in a particular school/college/service or as part of a centralised team, and will be involved in the investigation and in coordinating all aspects of the response to the complainant. This may include preparing a comprehensive written report, including details of any procedural changes in service delivery and identifying wider opportunities for learning across the Institution. This also requires clear direction and support from senior management on the extent and limits of discretion and responsibilities in investigating and resolving complaints, including the ability to identify failings, take effective remedial action and apologise, where it is appropriate to do so.
- 4.1.10 Complaints Assessors: At least two Academic Assessors for Complaints will assist the Principal and the Deputy Secretary in the discharge of their responsibilities in relation to the Complaints Procedure, this may include providing advice and expertise to complaint investigations and, where appropriate, acting as complaint investigator.
- 4.1.11 The Complaints Resolution Office: is responsible for ensuring all new staff receive training on the CHP as part of the induction process, and that refresher training is provided for current staff on a regular basis.
- 4.1.12 The Institution's SPSO liaison officer: Our SPSO liaison officer's role may include providing complaints information in an orderly, structured way within requested timescales, providing comments on factual accuracy on our behalf in response to SPSO reports, and confirming and verifying that recommendations have been implemented.

4.2 Recording, reporting, learning from and publicising complaints

- 4.2.1 Complaints provide valuable feedback. One of the aims of the CHP is to identify opportunities to improve services across [the institution]. By recording and analysing complaints data, we can identify and address the causes of complaints and, where appropriate, identify training opportunities and introduce service improvements.
- 4.2.2 We also have arrangements in place to ensure complaints about contractors are recorded, reported on and publicised in line with this CHP.

Recording complaints

- 4.2.3 We record suitable data to enable us to fully investigate and respond to the complaint, as well as using our complaint information to track themes and trends. As a minimum, we should record:
- the complainant's name and contact details
 - the date the complaint was received
 - the nature of the complaint
 - the service the complaint refers to
 - staff member responsible for handling the complaint
 - action taken and outcome at frontline response stage
 - date the complaint was closed at the frontline response stage
 - date the investigation stage was initiated (if applicable)
 - action taken and outcome at investigation stage (if applicable)
 - date the complaint was closed at the investigation stage (if applicable); and
 - the underlying cause of the complaint and any remedial action taken.
 - the outcome of the SPSO's investigation (where applicable).
- 4.2.4 If the complainant does not want to provide any of this information, we will reassure them that it will be managed appropriately, and record what we can.
- 4.2.5 Individual complaint files will be stored in line with our document retention policy.

Learning from complaints

- 4.2.6 We have clear systems in place to act on issues identified in complaints. As a minimum, we will:
- seek to identify the root cause of complaints
 - take action to reduce the risk of recurrence; and
 - systematically review complaints performance reports to improve service delivery.
- 4.2.7 Learning may be identified from individual complaints (regardless of whether the complaint is upheld or not) and from analysis of complaints data.
- 4.2.8 Where we have identified the need for service improvement in response to an individual complaint, we will take appropriate action. We will:

- the action needed to improve services must be authorised by an appropriate manager
- an officer (or team) should be designated the 'owner' of the issue, with responsibility for ensuring the action is taken
- a target date must be set for the action to be taken
- the designated individual must follow up to ensure that the action is taken within the agreed timescale
- where appropriate, performance in the service area should be monitored to ensure that the issue has been resolved; and
- any learning points should be shared with relevant staff.

4.2.9 Senior management will review the information reported on complaints regularly to ensure that any trends or wider issues which may not be obvious from individual complaints are quickly identified and addressed. Where we identify the need for service improvement, we will take appropriate action (as set out above). Where appropriate, performance in the service area should be monitored to ensure that the issue has been resolved.

Reporting of complaints

4.2.10 We have a process for the internal reporting of complaints information, including analysis of complaints trends. Regularly reporting the analysis of complaints information helps to inform management of where services need to improve.

4.2.11 We will report at least quarterly to senior management and at least annually to the governing body on:

- performance statistics, in line with the complaints performance indicators published by SPSO
- analysis of the trends and outcomes of complaints (this should include highlighting where there are areas where few or no complaints are received, which may indicate either good practice or that there are barriers to complaining in that area).

Publicising complaints information

4.2.12 We will publish information on complaints outcomes and actions taken to improve services. The focus is on improving positive communication on the value of complaining and demonstrating examples of how complaints have helped improve services.

4.2.13 This demonstrates the improvements resulting from complaints and shows that complaints can help to improve our services. It also helps ensure transparency in our complaints handling service and will help to show that we value complaints.

4.2.14 We will publish an annual complaints performance report on our website in line with SPSO requirements, and provide this to the SPSO on request. This summarises and builds on the quarterly reports we have produced about our services. It includes:

- performance statistics, in line with the complaints performance indicators published by the SPSO; and

- complaint trends and the actions that have been or will be taken to improve services as a result.

4.2.15 These reports will be made easily accessible to members of the public and available in alternative formats as requested.

The University of Glasgow Complaints Handling Procedure

Adapted from the Scottish Higher Education Model Complaints Handling Procedure as set out by the Scottish Public Service Ombudsman (SPSO)

Part 5: University of Glasgow complaints procedure – a guide for students

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We value complaints and use information from them to help us improve our services.

The University of Glasgow is committed to providing an excellent education and high-quality services to our students from admission to graduation. We also aim to provide high-quality services to all other stakeholders and to maintain good relations with the local community.

This procedure operates in accordance with the University's Equality & Diversity Policy which requires that complainants will be treated fairly and consistently without discrimination.

Students should be aware that the Complaints Handling Procedure is not the only means of raising concerns with the University. For instance, concerns about the quality or organisation of programmes of study might most effectively be referred in the first instance to the appropriate Staff/Student Committee through the Class/Year Representative or the Students' Representative Council (SRC) representative for the relevant area. Students can also discuss matters informally with the Head of School, Head of the Administrative Department or Support Service, an Adviser of Studies, Supervisor, Course Co-ordinator, College Administrator or other member of staff without invoking the Complaints Handling Procedure.

Further details of our Complaints Handling Procedure can be found here [\[LINK\]](#)

1. If something goes wrong or you are dissatisfied with our services, please tell us. This document describes our complaints procedure and how to make a complaint. It also tells you about how we will handle your complaint and what you can expect from us.

What is a complaint?

2. We regard a complaint as any expression of dissatisfaction about our action or lack of action, or about the standard of service provided by us or on our behalf.

What can I complain about?

3. You can complain about things like:
 - failure or refusal to provide a service
 - inadequate quality or standard of service, or an unreasonable delay in providing a service
 - the quality of facilities or learning resources
 - dissatisfaction with one of our policies or its impact on the individual (although it is recognised that policy is set at the discretion of the university)
 - failure to properly apply law, procedure or guidance when delivering services
 - failure to follow the appropriate administrative process
 - conduct, treatment by or attitude of a member of staff or contractor (**except** where there are arrangements in place for the contractor to handle the complaint themselves),; or
 - disagreement with a decision, (**except** where there is a statutory procedure for challenging that decision, or an established appeals process followed throughout the sector).
4. Your complaint may involve more than one *University of Glasgow School* or service or be about someone working on our behalf.

What can't I complain about?

5. There are some things we can't deal with through our complaints handling procedure. These include:
- a request for information or an explanation of policy or practice
 - a response to an invitation to provide feedback through a formal mechanism such as a questionnaire or committee membership
 - a concern about student conduct
 - a routine first-time request for a service
 - a request for compensation only
 - an insurance claim
 - issues that are in court or have already been heard by a court or a tribunal (if you decide to take legal action, you should let us know as the complaint cannot then be considered under this process)
 - disagreement with a decision where there is a statutory procedure for challenging that decision (such as for freedom of information and subject access requests), or an established appeals process followed throughout the sector (such as an appeal about an academic decision on assessment or admission)
 - a request for information under the Data Protection or Freedom of Information (Scotland) Acts, or the Environmental Information Regulations
 - a grievance by a staff member or a grievance relating to employment or staff recruitment
 - a concern raised internally by a member of staff (which was not about a service they received, such as a whistleblowing concern)
 - concerns about services outwith the University's delegated responsibilities (e.g. conference and accommodation services to commercial clients)
 - a concern about a child or an adult's safety
 - an attempt to reopen a previously concluded complaint or to have a complaint reconsidered where we have already given our final decision
 - abuse or unsubstantiated allegations about our University or staff where such actions would be covered by our *Code of Unacceptable Behaviour* or
 - a concern about the actions or service of a different organisation, where we have no involvement in the issue (**except** where the other organisation is delivering services on our behalf).
6. If other procedures or rights of appeal can help you resolve your concerns, we will give information and advice to help you.

Who can complain?

7. Anyone who receives, requests or is directly affected by our services can make a complaint to us. This includes the representative of someone who is dissatisfied with our service (for example, a relative, friend, advocate or adviser). If you are making a complaint on someone else's behalf, you will normally need their written consent. Please also read the section on **Getting help to make your complaint** below.

How do I complain?

8. You can complain in person our office, by phone, in writing, by email *[or via our complaints form [LINK](#)]*.

9. It is easier for us to resolve complaints if you make them quickly and directly to the service concerned. Where possible, your concerns should be raised with the relevant staff member, tutor, university representative or school office. Then they can try to address the issue.
10. When complaining, please tell us:
- your full name and contact details
 - as much as you can about the complaint
 - what has gone wrong; and
 - what outcome/resolution you are seeking.

How long do I have to make a complaint?

11. Normally, you must make your complaint within six months of:
- the event you want to complain about; or
 - finding out that you have a reason to complain.
12. In some circumstances, we may be able to accept a complaint after the time limit. If you feel that the time limit should not apply to your complaint, please tell us why. We will apply these time limits with discretion, considering the seriousness of the issue, the availability of relevant records and staff involved, how long ago the events occurred, and the likelihood that an investigation will lead to a practical benefit for the complainant or useful learning for the institution.

What happens when I have complained?

13. We will always tell you who is dealing with your complaint. Our complaints procedure has two stages.

Stage 1: Frontline response

14. We aim to respond to complaints quickly (where possible, when you first tell us about the issue). This could mean an on-the-spot apology and explanation if something has clearly gone wrong, or immediate action to resolve the problem.
15. We will give you our decision at stage 1 in five working days or less, unless there are exceptional circumstances.
16. If you are not satisfied with the response we give at this stage, we will tell you what you can do next. If you choose to, you can take your complaint to stage 2. You must normally ask us to consider your complaint at stage 2 either:
- within six months of the event you want to complain about or finding out that you have a reason to complain; or
 - within two months of receiving your stage 1 response (if this is later).

17. In exceptional circumstances, we may be able to accept a stage 2 complaint after the time limit. If you feel that the time limit should not apply to your complaint, please tell us why.

Stage 2: Investigation

18. Stage 2 deals with two types of complaint: those where the complainant remains dissatisfied after stage 1 and those that clearly require investigation, and so are handled directly at this stage.

19. When using stage 2:

- we will acknowledge receipt of your complaint within three working days
- we will confirm our understanding of the complaint we will investigate and what outcome you are looking for
- we will try to resolve your complaint where we can (in some cases we may suggest using an alternative complaint resolution approach, such as mediation); and
- where we cannot resolve your complaint, we will give you a full response as soon as possible, normally within 20 working days.

20. If our investigation will take longer than 20 working days, we will tell you. We will tell you our revised time limits and keep you updated on progress.

What if I'm still dissatisfied?

21. After we have given you our final decision, if you are still dissatisfied with our decision or the way we dealt with your complaint, you can ask the Scottish Public Services Ombudsman (SPSO) to look at it.

The SPSO are an independent organisation that investigates complaints. They are not an advocacy or support service (but there are other organisations who can help you with advocacy or support).

You can ask the SPSO to look at your complaint if:

- you have gone all the way through the *[university]*'s complaints handling procedure
- it is less than 12 months after you became aware of the matter you want to complain about; and
- the matter has not been (and is not being) considered in court.

The SPSO will ask you to complete a complaint form and provide a copy of our final response to your complaint. You can do this online at www.spsso.org.uk/complain/form or call them on Freephone 0800 377 7330.

You may wish to get independent support or advocacy to help you progress your complaint. See the section on **Getting help to make your complaint** below.



The SPSO's contact details are:

SPSO
Bridgeside House
99 McDonald Road
Edinburgh
EH7 4NS
(if you would like to visit in person, you must make an appointment first)

Their freepost address is:
FREEPOST SPSO

Freephone: 0800 377 7330
Online contact www.spsso.org.uk/contact-us
Website: www.spsso.org.uk

Getting help to make your complaint

22. We understand that you may be unable or reluctant to make a complaint yourself. We accept complaints from the representative of a person who is dissatisfied with our service. We can take complaints from a friend, relative, or an advocate, if you have given them your consent to complain for you.

23. In order for us to accept a complaint from someone acting on your behalf, you must confirm the name of the person you are consenting to making the complaint for you and confirm that you are aware they may be given full detail on any matters we consider relevant to the complaint, as part of our response. We will not fully communicate with anyone making a complaint on behalf of someone else until we are satisfied we have an appropriate level of consent from the person they are making the complaint on behalf of.

24. Useful contact details:

There are a variety of support services available to students:

- *Reach Out www.gla.ac.uk/myglasgow/students/reachout/*
- *Student Support Services www.gla.ac.uk/study/studentlife/support/*
- *Safety, health and wellbeing available here:
www.gla.ac.uk/myglasgow/students/safetyhealth/*
- *There are a number of support services available which can provide helpful support to those who wish to pursue a complaint with the University.*
- *The SRC Advice Centre is an advice, information and representation service provided by the Students' Representative Council (SRC) for all Glasgow University students. The Advice Centre offers free and confidential advice.*
- <https://www.glasgowstudent.net/advice/>



Information on harassment and bullying is provided in the Dignity at Work and Study Policy.

- <https://www.gla.ac.uk/myglasgow/humanresources/equalitydiversity/dignityworkstudyover/>

International students may seek advice from the International Student Adviser.

- <https://www.gla.ac.uk/international/support/contact/>

Research students may seek advice from their Graduate School Administrator.

25. We are committed to making our service easy to use for all members of the community. In line with our statutory equalities duties, we will always ensure that reasonable adjustments are made to help you access and use our services. If you have trouble putting your complaint in writing, or want this information in another language or format, such as large font, or Braille, please contact us.

26. Please contact us by the following means:

Website: <https://www.gla.ac.uk/connect/complaints/>

Ivanti link

By email: complaints@glasgow.ac.uk

By telephone: 0141 330 xxx

In person or writing: The Complaints Resolution Office, Gilbert Scott Building, University of Glasgow, Glasgow, G12 8QQ.