

Glasgow Life Complaints Handling Procedure

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Glasgow Life is committed to providing high-quality customer services. Glasgow Life will comply with Glasgow City Council's Complaints Handling Procedure.

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

- 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?

- 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?

- 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.
 - Dissatisfaction with one of our policies or its impact on the individual.
 - 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).
 - complaints about elected members (these will be passed to Glasgow City Council)
 - complaints about senior staff (these will be investigated by an appropriate level of the management team and will be independent of the situation)

Note:

Complaints can be received by elected members on behalf of their constituents and processed via the Complaints Handling Procedure (CHP).

- Your complaint may involve more than one Glasgow Life service or be about someone working on our behalf.

What can't I complain about?

- There are some things we can't deal with through our complaints handling procedure. These include:
 - a routine first-time request for a service.
 - a first-time report of a fault.
 - a request for compensation only.
 - 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.
 - a request for information under the Data Protection or Freedom of Information (Scotland) Acts.
 - 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).
 - 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 organisation or staff, where such actions would be covered by our Expected Behaviours Policy.
 - elected members enquiries.
- If other procedures or rights of appeal can help you resolve your concerns, we will give information and advice to help you.
- A concern about the actions or service of a different organisation, where we are not involved in the issue (except where the other organisation is delivering services on our behalf).

Who can complain?

- 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?

- You can complain in person at any of our venues, by phone, in writing, by email or via our comments form or online comments form:
<https://www.glasgowlife.org.uk/contact-us/leave-a-comment>
- It is easier for us to address complaints if you make them quickly and directly to the service concerned. So please talk to a member of our staff at the service you are complaining about. Then they can try to resolve the issue.
- When complaining, please tell us:
 - your full name and contact details (if you require a response)
 - as much as you can about the complaint
 - what has gone wrong; and
 - what outcome you are seeking.

Our contact details

- by writing to: FREEPOST RTAB-EBBR-UTKG, Glasgow Life, Commonwealth House, 38 Albion Street, Glasgow G1 1LH
- by email to: info@glasgowlife.org.uk
- by telephoning: Glasgow Life on 0141 287 8977
- by using the online Customer Comments form at:
<https://www.glasgowlife.org.uk/contact-us/leave-a-comment>

How long do I have to make a complaint?

- 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.
- In exceptional 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.

What happens when I have complained?

- The appropriate manager/appropriate staff member will deal with your complaint. Managers will always identify themselves on formal correspondence.
- Our complaints procedure has two stages.

Stage 1: Frontline response

- 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.
- We will give you our decision at Stage 1 in five working days or less, unless there are exceptional circumstances.
 - 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).
- 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

- Stage 2 deals with two types of complaint: those that have not been resolved at Stage 1 and those that clearly require investigation, and so are handled directly at this stage. If you do not wish your complaint to be handled at Stage 1, you can ask us to handle it at Stage 2 instead. Glasgow Life can also choose to escalate the complaint to Stage 2.
 - 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.
- 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?

- 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.
- There are some complaints that have an alternative route for independent review. We will tell you how to seek independent review when we give you our final response to your complaint.

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 Glasgow Life'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.

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

Care complaints

If your complaint relates to a care service Glasgow City Council provide, you can choose whether to complain to:

- **Glasgow City Council** at: <https://www.glasgow.gov.uk/complaints>; or the
- **Care Inspectorate**. You can find out more about their complaints' procedure, or make a complaint, by contacting them.

The Care Inspectorate has several offices around Scotland. Please refer to: <http://www.scswis.com/>

Getting help to make your complaint

- 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 make the complaint for you.
- A mandate is required to confirm personal consent.

Where necessary, staff will assist the customer by writing the complaint for them and read it back, to ensure that an accurate record of the complaint has been taken. Where possible, customers should endorse the letter to show that it has been agreed.

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.

- 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.
- You can find out about advocates in your area by contacting:

Scottish Independent Advocacy Alliance

Tel: **0131 510 9410**

Website: www.siaa.org.uk

Citizens Advice Scotland

You can find out about advisers in your area through Citizens Advice Scotland:

Website: www.cas.org.uk

- Please contact us by the following means:
 - by writing to: Administrative Hub, Glasgow Life, Commonwealth House, 38 Albion Street, Glasgow G1 1LH
 - by email to: info@glasgowlife.org.uk
 - by telephoning: Glasgow Life on 0141 287 8977; and
 - by using the online Customer Comments form at: <https://www.glasgowlife.org.uk/contact-us/leave-a-comment>

We can also give you this leaflet in other languages and formats (such as large print, audio and Braille).

Quick guide to our complaints procedure

Complaints Procedure

You can make your complaint in person, by phone, by email or in writing.

We have a **two-stage complaints procedure**. We will always try to deal with your complaint quickly. But if it is clear that the matter will need investigation. We will tell you and keep you updated on our progress.

Stage 1: Frontline response

We will always try to respond to your complaint quickly, within **five working days** if we can.

If you are dissatisfied with our response, you can ask us to consider your complaint at Stage 2.

Stage 2: Investigation

We will look at this stage if you are dissatisfied with our response at Stage 1. We also look at some complaints immediately at this stage, if it is clear that they need investigation.

We will acknowledge your complaint within **three working days**.

We will confirm the points of complaint to be investigated and what you want to achieve.

We will investigate the complaint and give you our decision as soon as possible. This will be after no more than **twenty working days** *unless* a longer investigation is required.

Scottish Public Services Ombudsman

If, after receiving our final decision on your complaint, you remain dissatisfied with our decision or the way we have handled your complaint, you can ask the SPSO to consider it.

There are some complaints that have an alternative route for independent review. We will tell you how to seek independent review, when we give you our final response to your complaint.

Appendix 1: Expected Behaviour Procedure

To protect staff from unacceptable behaviour, such as unreasonable persistence, threats or offensive behaviour from customers, the action we take will be appropriate and proportionate to restrict access, where we decide that someone is unreasonably persistent or demanding. We support positive engagement and will let people know what standards to expect from us.

Dealing with abusive behaviour etc.

Glasgow Life staff will end telephone calls, if the caller is considered aggressive, abusive or offensive. The staff member taking the call has the right to make the decision, tell the caller that the behaviour is unacceptable, and end the call if the behaviour does not stop.

Likewise, we do not process correspondence (letter, fax or email) that is abusive to staff or contains allegations that lack substantive evidence. When this happens, we will tell the customer that we consider their language offensive, unnecessary and unhelpful. We will ask them to stop using such language and state that we will not respond.

We have zero tolerance of threats, violence and abusive behaviour towards staff. This is to ensure their own safety and well-being and protects the office and others.

Dealing with threats or use of physical violence

The threat or use of physical violence, verbal abuse, or harassment, towards Glasgow Life staff, is likely to result in the ending of all direct contact with the customer. The Health and Safety Executive's definition of work-related violence is: "any incident in which a person is abused, threatened or assaulted in circumstances relating to their work." Incidents may be reported to the police.

Employees have the right to perform their duties without fear of abuse, injury, violent behaviour, or threats. Glasgow Life's Prevention of Work-Related Violence Policy identifies the roles and responsibilities for dealing with the issue of work-related violence.

<https://intranet.glasgowlife.org.uk/article/4359/Managing-Work-Related-Violence-Policy>

Glasgow Life wants to ensure that customers who are unreasonably persistent or demanding are dealt with fairly, honestly, and properly; that the resources of the company are used as effectively as possible; and that other customers and users or employees of Glasgow Life do not suffer any detriment because of their behaviour. We will, therefore, apply our policies and procedures to protect everyone from unacceptable behaviour. Where we decide to restrict access to a customer, we have a procedure in place to communicate that decision, notify the customer of a right of appeal, and review any decision to restrict contact with us. This will allow the customer to demonstrate a more reasonable approach later.

Opportunity to modify behaviour

Wherever possible, we will give a customer the opportunity to modify their behaviour or action before a decision is taken to restrict access. This also applies to anyone acting on behalf of a customer or who contacts us in connection with our business.

When a physical threat is made, we may report it to the police. This includes situations when the threat made is not to us but a threat to harm a third party.

Unreasonable levels of contact

Sometimes the volume and duration of contact made to our office causes problems. This can occur over a short period, for example, several calls in one day or one hour. It may occur over the lifespan of a complaint, when someone repeatedly makes long telephone calls to us or inundates us with information that has been sent already or that is irrelevant to the service we are providing.

We consider that the level of contact has become unacceptable when the amount of time spent on the telephone, or responding to, reviewing and filing emails or written correspondence or managing the contact, impacts on our ability to provide a service to that person or organisation, or to provide a service to others.

Restricting access

This may mean we apply restrictions such as communicating via letters only or restricting telephone calls to specified times, with a named officer. We will try to maintain at least one form of contact and do it in a way, wherever possible, that allows a complaint to progress to completion through our complaints process.

The Senior Management Team shall make the decision as to when communication is restricted with regards to persistent and demanding complainants.

If a decision is taken to restrict access, the Senior Management Team will write to the customer explaining why we are restricting access, what action we are taking and the duration of that action. We will also tell the customer what they can do to have the decision reviewed. A decision to restrict customer contact may be reconsidered, if the customer demonstrates a more acceptable approach.

Reviewing a customer's case

Glasgow Life acknowledges that some complaints may be difficult to resolve and can cause anxiety and distress to customers, and employees. Whilst Glasgow Life will always aim to try to find a way to resolve matters, there may be circumstances where a customer persists in pursuing a complaint when the complaints procedure has been properly and fully implemented.

In such cases a review of the customer's case will be carried out to ensure that it does not contain new issues which merit a response, and we will advise them accordingly. This may result in informing the customer that no further action can be taken if there are no new or substantive issues. Any further

correspondence will be read and filed, but only acknowledged or responded to if the customer provides significant new information relating to the complaint.

Referring to SPSO

We will also consider referring a persistent customer to the SPSO ourselves, if the customer will not and does not do so themselves, and ask that the SPSO be the final arbiter in any dispute that has arisen.