

Effective Complaints Handling

Shropshire Council Guidance Third Party Providers

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1. Introduction

A complaint is “an expression of dissatisfaction about a council service (whether that service is provided directly by the council or by a contractor or partner) that requires a response”. (*LGO definition*)

The Local Government Ombudsman is clear that:

“..councils keep responsibility for third party actions, including complaint handling, no matter what the arrangements are with that party” and “We will treat any complaint about a service provided by a third party on behalf of the council as being against that council.”

Local Authorities need to ensure they have:

- An up to date understanding of the complaints procedures used by commissioned services.
- Clarity concerning when a complaint needs to be handled by the commissioner for example complaints about funding levels or policy.
- Robust complaints data collection and reporting.
- Clear arrangements for the use of learning from complaints.

Shropshire Council has developed some guidance to support our commissioned services in their work to handle complaints. The guidance sets out our expectations for organisations delivering services on our behalf.

Contracts will set out how commissioned providers should manage and report complaints and providers should discuss individual arrangements with their commissioner. However, as a general rule **we expect commissioned providers** to:

- 1) Have an up to date and robust complaints procedure.
- 2) Clearly advertise how those using services may make a complaint and what they can expect from the complaints process.
- 3) Adopt good practice in the handling of complaints.
- 4) Report customer feedback to Shropshire Council on a regular basis (to include complaints and compliments).
- 5) Discuss learning from complaints with commissioners and identify and monitor service improvements where necessary.

This guidance aims to support organisations providing services on behalf of Shropshire Council to implement an effective complaints handling procedure. For more advice and information about how to handle and report complaints speak to your commissioner or contact Shropshire Council's Commissioning Support Unit.

Telephone: 01743 258519

Email: commissioning.support@shropshire.gov.uk

2. Developing a Complaints Procedure

This information sheet suggests some key things to consider when developing or reviewing your organisation's complaints procedure. It may also be a good idea to take a look at some complaints procedures available on the internet to get ideas about how to present the information and examples of good practice you may wish to learn from.

1. The procedure

Your complaints procedure will be a public document that should be easily accessible. Think about wording things as clearly as possible and presenting the information in a way that can be understood by all. You should clearly set out the following information by means of introduction:

- What the complaints procedure is for
- What the procedure includes
- Key principles and ways of working
- Context

You should make reference to regulations and any legal requirements relating to your type of service. For example social care complaints are covered in the Children Act 1989 Representations Procedure (England) Regulations 2006, and The Local Authority Social Services and National Health Service Complaints (England) Regulations 2009.

2. Scope

It is important for the complaint procedure to set out what can be complained about and what is exempt from the complaints procedure. Commonly, a complaint would relate to:

- An unwelcome or disputed decision (if no appeal process applies)
- Concern about the quality or appropriateness of a service
- Delay in decision making or provision of services
- Delivery or non-delivery of services
- Quantity, frequency, change or cost of a service
- Attitude or behaviour of staff (unless it warrants internal disciplinary action)

There are some issues that you may decide are not covered by your complaints process and these could be:

- An employee issue (you should handle these through your disciplinary and grievance procedures).
- A complaint resolved on the spot, to the complainant's satisfaction, without the need for an investigation.
- A complaint that is not appropriate (perhaps relating to a service provided by a different organisation).
- A complaint that has already been investigated and resolved.
- An issue that can be taken forward through another formal process such as an appeals process, insurance claim, court proceedings etc.

If a complaint falls outside of your complaints procedure you should inform the complainant as soon as possible that you will not be taking the complaint forward and clearly explain the reason for your decision.

Your complaints procedure should also set out how you will consider a complaint regarding external contractors or subcontractors you are responsible for. This may commonly involve the provider responding in the first instance before your involvement at a second stage of the process.

3. Time Limit

It is common practice to set a time limit for complaints. If an incident has happened a long time ago it can be very difficult to fairly investigate and provide a decision. It is usual to expect a complaint to be made within 12 months of: a) the date the event occurred or b) the date the event came to the notice of the complainant.

You may choose to make an exception to this rule if you feel the complainant can give a good reason for not making the complaint sooner or that, despite the time lapse it is still possible to fairly and comprehensively investigate the complaint.

4. Claims Process and Relationships to Other Procedures

Your organisation may have a process for accepting compensation claims and this should be referred to within your complaints procedure. There may also be other procedures that link to your complaints procedure (such as an unreasonably persistent or vexatious procedure) and you should explain how these work together so that customers understand what they can expect and whether or not they should be progressing their concerns through another route.

5. Ways to complain

Your complaints procedure should set out the various ways in which someone can make a complaint. You should state how people can complain, for example:

- Face to face
- Over the telephone
- In writing or by email.

Where a complaint is made in person or on the telephone tell the complainant you will:

- make a written record of the complaint
- provide a copy of the written record within an acknowledgement letter/email.

The ways in which people can complain should be set out in a complaints leaflet and on your website. It would be good practice to offer customers:

- Assistance to enable them to understand the complaint procedure
- Guidance concerning any local advocacy services they may use
- The option to seek information in other languages and formats such as braille or audio (on request).

6. Who may complain

You may find it difficult to investigate anonymous complaints because you may not have enough information to determine the nature of the complaint or event/incident described. If you decide not to investigate anonymous complaints you should make this clear within your procedure.

Some people may complain on behalf of someone else. Your procedure should set out the circumstances under which you will accept a complaint from a representative. For example you may accept a complaint from a representative if:

- You know that the customer has consented, either verbally or in writing to the representative making a complaint on their behalf; or
- The service user cannot complain unaided and cannot give consent because they lack capacity within the meaning of the Mental Capacity Act 2005; and/or
- The representative is acting in the customer's best interests (for example, where the matter complained about, if true, would be detrimental to the service user) and you cannot see any reason why information could not be shared (you should consider data protection and information sharing issues if you are taking on a complaint without consent).

7. Your Framework for Managing Complaints

Your complaints procedure will need to clearly set out the framework your organisation will use to handle complaints and the process, stages and timescales you have in place. Consider the following examples and adapt accordingly.

Timescales

- It is common practice to aim to acknowledge complaints within 3 to 5 working days (this will depend on the size of your organisation and your capacity to respond).

- You should aim to respond to complaints within 20 to 30 working days (many organisations aim to respond within 20 working days or less but it will depend on the nature of your service and size of your organisation).
- The LGO suggests a 12 week (60 working days) total process (completing all stages) for adult social care complaints. These tend to be more complex than other forms of complaint so aim for 12 weeks or less depending on the nature of the service you provide.
- When setting timescales make sure you say working days if that is what you mean.

Process

You will need multiple stages within your complaints process. This will help you to move complaints forward and refer externally if a solution cannot be found at the initial stage. A common approach is:

- Complaint made
- Appointment of investigator
- Acknowledgement
- Stage 1 Investigation and Response
- Stage 2 Review (by the service or the commissioning body) and Response
- Signposting to external body (for example Ombudsman, CQC etc.)

An example of signposting to the LGO is given below:

Once your complaint has been fully dealt with by [name of care provider], if you are not satisfied with the outcome you can complain to the Local Government Ombudsman (LGO). The LGO provides a free, independent service. You can contact the LGO Advice Team for information and advice, or to register your complaint.
 T: 0300 061 0614
 W: www.lgo.org.uk
 Or write to: The Local Government Ombudsman, PO Box 4771, Coventry CV4 0EH

The Local Government Ombudsman suggests that all stages of the complaints process should be completed within 6 months but with very complex cases where multiple responses/correspondence is made at each stage that may not be possible. Make sure you keep complainants informed of progress within the process.

8. Investigations

Investigating complaints does require some core skills and you should ensure your organisation has a number of investigators with the seniority to resolve issues. The person with responsibility for acting as your 'complaints manager' should have a role in supporting your investigators and understand legal requirements and how the complaints process sits with other procedures. Some key points to consider include:

- Consider at an early stage whether any immediate action can be taken to resolve the complaint.
- The investigator must be independent of the complaint that has been made.
- The investigator should consider what happened, what should have happened and whether there is a difference between those two things.
- The investigator must be clear what they are investigating. Ensure the investigator understands the complaint being made.
- Ensure investigators have confidential storage and know where to record their work.

Some top tips for investigators are:

- Set clear objectives and plan the investigation well.
- Be objective, fair and impartial
- Record everything
- Obtain all the relevant evidence you can
- Conduct a sufficient investigation so as to establish all the relevant and material facts.

- Conduct interviews with those involved
- Following the proper process
- Do not include any unproven assumptions and/or unsubstantiated evidence
- Ensure your investigation will be in line with the complainant's expectations and communicate well.
- Present conclusions in a clear and logical manner
- Make realistic recommendations.
- Seek specialist advice where it is needed.

In reaching a conclusion consider:

- Potential failures – these may include human error or inappropriate behaviour by a member/members of staff, poor application of resources e.g. too late, insufficient, procedural or administrative problems; services not able to deliver the requirement; and the organisation failing to understand or accept its responsibilities.
- Working through all the points until there is a view on every aspect of the complaint.
- Include explanations.
- When making recommendations, try to make them practical, proportionate and constructive.
- In reaching a conclusion there are usually three options a) to uphold the view of one party because this is clearly supported by the evidence, b) to request additional information to explore the matter further; and c) to decide that the available evidence will never be conclusive.
- Clearly setting out a decision (see 9. Reaching a Decision below).

9. Reaching a Decision

It is helpful to apply three main outcomes for a complaint:

- a) Upheld - A complaint is upheld when the outcome of the investigation finds in the complainant's favour.
- b) Partly Upheld - The investigation finds in the complainant's favour, in part. Elements of a complaint may be upheld and others not upheld.
- c) Not Upheld - If a complaint is not upheld the investigation finds in the service provider's favour: the service provided was of a standard a reasonable person could expect.

The outcome or decision should be clearly recorded. If the complainant disagrees with the decision at Stage 1 it may be necessary to move to the next stage of the process.

10. The Duty to Co-operate

For health and social care services there is a duty to cooperate. This applies to local authorities and the NHS but if you are providing a service on behalf of those organisations you may become involved in what is commonly referred to as a 'joint complaint'. A joint complaint is usually coordinated by one body and information gathered from other service providers in order to provide one, comprehensive response and investigation. Local arrangements are in place to agree that, in these circumstances, one body will coordinate the handling of the complaint, communicate with the complainant, attend meetings, obtain consent forms etc.

11. Example Procedures

You can find example complaints procedures using the internet. Shropshire Council's complaints procedures are available.

More information on developing a complaints procedure and example documents are available from the Local Government Ombudsman. Although developed for social care providers they can be adapted for general use. Find the guidance here:

<http://www.lgo.org.uk/adult-social-care/resources-for-care-providers>

12. Guidance on Running a Complaints System

The LGO has produced a useful guidance document to support Council's in their work to design and implement a complaints system. It is a helpful document that could be applied to different types of organisations. Find a copy of guidance on running a complaints system here:

<http://www.lgo.org.uk/information-centre/reports/advice-and-guidance/guidance-notes>

3. Complaints Procedure Checklist

Use this checklist to ensure your complaints procedure covers some essential features. Review complaints reporting and handling regularly to ensure you have effective systems in place.

	Action/Task	Details	Complete ✓	Comments
1	There is a complaints procedure in place clearly setting out how complaints can be made.			
2	The procedure is made available to staff and customers.			
3	There is a named complaints manager/ overall lead contact.			
4	The procedure includes how complaints will be dealt with (timescales, process, stages etc.).			
5	Templates and best practice guidance is in place for all staff acknowledging and responding to complainants.			
6	A consent process is in place for handling complaints made by a representative.			
7	The procedure is clear concerning how complaints may be progressed if the complainant is not satisfied with the stage 1 response (e.g. escalated to the commissioner then to the Local Government Ombudsman).			
8	The organisation records actions and learning from complaints and it is clear how this learning will be used.			
9	There are processes in place for the monitoring and analysis of complaints and other customer feedback and this information is reported to the service commissioner.			
10	Staff members know how to respond to any complaints including alleged abusive behaviour (safeguarding referral processes are known).			

Notes

4. Good Practice Complaints Handling

Customer complaints are inevitable, no matter how well a service is provided. Although no one likes to receive a complaint, complaints do bring some benefits: they are a way of better understanding people's views and expectations and generating the learning needed for service improvement. Complaints should always be acknowledged and dealt with as efficiently and effectively as possible so that the people using your services recognise that their opinions and feedback is valued.

Making arrangements

- Identify someone within your organisation to act as complaints manager and develop and oversee the implementation of your organisation's complaints procedure. If you are a very small organisation this should be someone in a position of responsibility with experience of working with customers, someone able to make decisions and influence service change.
- Allocate people able to support the complaints manager in the investigation of complaints. Team leaders or service managers may be appropriate. Investigators should be of suitable seniority to resolve the issues raised in the complaint. It is important that the person investigating has had no previous involvement with the issue or complaint so having more than one investigator is usually necessary.
- Ensure all members of staff and anyone else involved in delivering or managing services, such as volunteers and Board Members, are aware of your complaints procedure and how to direct people wishing to make a complaint.
- Arrangements need to be in place to communicate with complainants by both letter and email. If you are able to, use a generic customer feedback email address (rather than an email direct to a member of staff). Promote this email in your complaints procedure.
- Information about how to complain should be available and easily accessible.

Taking a complaint

- When someone makes a complaint it can cause a mix of emotions, particularly if you have been working very hard to provide the best service you can. Try to keep your emotions in check however disappointed you may feel.
- Find a quiet and private place to speak. Ensure confidentiality.
- If the complainant is any or irate you will need to find ways of diffusing the situation. Offer them a seat. Explain you are listening (you can demonstrate this by taking notes). Keep your tone calm.
- If you are involved in the complaint being made, you may find it appropriate to ask an independent person to speak to the complainant instead or to sit in on the discussion. However, don't pass the complainant from person to person. No-one likes to repeat the same information over and over.
- Do your best to consider the experience of the customer and how you would feel in their shoes. You do not need to verbalise this but it can help you to take all the information on board.
- Don't let the complaint become personal. Complaints can often relate to a particular member of staff or volunteer. Encourage the complainant to keep the discussion factual and encourage them to steer away from making personal comments.
- Listen carefully, record all the information you are given, ask questions if you need to clarify the complaint and better understand the outcome the complainant is looking for.
- Avoid the temptation to provide excuses or argue back. Don't appear defensive. This may only exacerbate the situation.
- Try not to provide a detailed response on the spot, unless the complaint is straightforward and can be resolved instantly. It is usually sensible to take time to reflect and you do not want to pre-empt the information that will be included within the investigation and resulting response.
- Once you understand the complaint you may wish to offer an apology. You can apologise that the customer has had an unsatisfactory experience and has felt the need to complain without jumping to any conclusions concerning the outcome of the complaint. Any number of factors could have contributed to the issue and your organisation might not be at fault.
- Check that you have contact details and confirm a response will be provided in line with the timescales set out in your complaints procedure.

Dealing with the complaint

- Complaints should always be resolved as quickly as possible. The aim is to make the customer feel as though their problem is being treated as a priority, without being rushed.
- Communicate effectively. Keep the customer updated with progress. If there are going to be delays then explain that more time is needed to investigate and inform the customer when they can expect a response.
- If you are responsible for overseeing the complaint but not the investigating officer, keep in touch with the investigating officer to ensure they are on track and have the information they need.
- Keep all complaints moving towards a solution. Try not to let a complaint get stuck without reaching a satisfactory outcome for the customer. Your complaints procedure should include stages for review and escalation to the commissioner or an independent body.
- Keep comprehensive records from the initial problem to the final response.

Checking your process

- Clarify what will be taken as a complaint. For example it is common to set the rule that issues more than 12 months old may not be included because significant time will have passed and make an investigation very difficult to carry out.
- Ensure complainants are being informed what to expect. You should acknowledge complaints and provide the name and role of the person who will investigate the complaint.
- Check that your staff and/or volunteers know what is expected of them.
- Check all available methods of making a complaint are working effectively – for example email, telephone, in person complaints, written complaints and online forms.
- Check that the method you are using for recording complaints is effective. Are all complaints being recorded in the right way? Is all the right information being collected? Are records being stored correctly (consider good practice in data protection and information sharing)?
- Ensure you have built appropriate commissioner referrals into your complaints process. This is particularly important if you provide services such as social care or housing. If a commissioning organisation has placed someone in your care they should feature within your complaints process. The Ombudsman will see the commissioner as responsible for complaints and so they should review your complaints after you have provided a comprehensive response at stage 1 and answered all issues raised by the complainant and have nothing more to add. Ensure you agree how this will be managed with your commissioner.
- Some types of complaints may be referred directly to the commissioner so make sure this is clear within your procedure. For example, if complainants have concerns over levels of funding, policy decisions, decisions taken by the commissioning body, or issues related to the contract then these will require a commissioner response.

Measuring effectiveness

- Ensure the way you are working is in line with your complaints procedure. Your procedure should include timescales for acknowledging and responding to complaints. It can be helpful to use performance measures if you are responding to a higher volume of complaints and need to monitor responses.
- Once you have confirmed the measures you will use to ensure you are managing complaints and customer feedback effectively you should try to incorporate this into your regular performance reporting. Quarterly reporting is usually adequate but if you have a high volume of complaints or have concerns about an area of service consider monthly or more regular monitoring until issues are resolved.
- Provide reports to your commissioner on a regular basis (as agreed within your contract – quarterly is recommended).

5. Advertising your Complaints Procedure

Once you have a complaints procedure in place you should not find it too difficult to promote it but here are a few things to consider.

Generally people do not like to complain. A formal complaint will usually only be made when people have not been able to find a solution to concerns they may have or don't feel able to comment in any other way. When you promote your complaints procedure you should also promote opportunities for people to raise more informal forms of feedback and compliments.

What to include?

When promoting your complaints procedure there are a few things to include:

- Options of how to complain (for example speaking to a member of staff, telephone, email, webpage form etc.)
- Contact details
- What people can complain about (some complaints may need to be referred directly to the commissioner or via another route such as safeguarding, police etc.)
- Who may make a complaint
- What people can expect after they have made a complaint (including timescales)
- Where to obtain a copy of the procedure

How?

A complaints procedure should be written in a way that makes it easy to read but it is a formal document so you may find it helpful to also produce a webpage and/or leaflet setting out how to make a complaint. You may also wish to use posters and display screens depending on the nature of the services you provide and how people access them. Consider mentioning how to provide feedback within service materials/literature and reporting back within your organisation's annual report. You could include what you have learnt from complaints and other forms of feedback alongside examples of compliments.

Where?

You should promote your complaints procedure and opportunities to provide feedback in accessible places. All organisations should promote their complaints procedure on their website. Other locations may include waiting rooms, reception areas and well visited public spaces.

Who should promote the procedure?

All members of staff and volunteers (including Board Members/ trustees etc.) should be aware of the organisation's complaints procedure. If concerns are raised staff need to know how to respond. All new members of staff should be made aware of your procedure and expectations and staff reminded at regular intervals. Staff members should feel confident in directing people to the complaints procedure and explaining how a complaint can be made.

Who can complain?

This may differ for different service types but it is generally good practice to ensure that in addition to the people using your services, other people should be able to complain on behalf of a customer. For example if you support children, their parents/carers, a trusted adult or advocate should be able to complain on their behalf. If you support older people they may wish a carer, family member or advocate to take forward a complaint on their behalf. You may decide that anyone can complain or, if your service involves more sensitive information, you may wish to adopt a process of seeking consent from the complainant before allowing someone else to take forward the complaint.

When?

Your complaints procedure should be clearly advertised at all times. You may wish to remind people of the opportunity to complain and provide customer feedback every now and again but the information should be permanently available in an accessible place.

6. Developing Complaints Templates

Preparing templates for use in responding to complaints can be really helpful. Templates can remind those responding to complaints of the need to include particular information. Templates are also flexible enough to be amended. Key points to consider in the development of letter templates are listed below.

Acknowledgement

An acknowledgement letter or email should include:

- A summary of the complaint and the key points that will be investigated.
- An offer to add to the complaint and provide additional information.
- The way in which the complaint is to be handled (in line with the organisations complaints procedure).
- The timescale that will be applied (such as the date the complainant can expect a response by).
- The name and role of the person who will investigate the complaint.
- Contact details.

Holding Note

Some complaints may be more complex and investigations may be delayed for a variety of reasons. It is a good idea to have a holding letter/email prepared. Within the holding letter or email you should include:

- An apology that you will not make the timescale set for the response (and an explanation if appropriate).
- Reassurance that the complaint is being investigated and a response will be provided.
- A new response date.
- Contact details in case the complainant needs to get in touch.

Response

Your complaint response should include:

- Steps taken to investigate (how much information you share will need to be carefully considered. It is often not appropriate to go into too much detail. You may just mention the methods used such as reviewing correspondence, holding interviews etc.)
- A response to each of the points within the complaint (reflecting the contents of the acknowledgement).
- An apology, if mistakes have been made. This should be clearly worded and sincere.
- The outcome/decision (some elements of the complaint may be upheld and others not upheld so the outcome would be partly upheld).
- Any actions and learning from the complaint.
- Signposting to the next stage of the complaints process (this may be a commissioner or the LGO).

The Local Government Ombudsman has detailed information and templates available for social care providers. These can be accessed here:

<http://www.lgo.org.uk/adult-social-care/resources-for-care-providers>

7. Complaints Recording and Reporting

In order to respond to and manage complaints effectively, you will need some core data and a robust recording process.

Some key points to consider are included below.

Recording a complaint

In order to investigate a complaint and monitor how effectively you have handled complaints as an organisation you will need the following core data:

- A reference number (you can use this on all correspondence relating to a case to ensure all details can be linked and pulled together).
- Summary of the complaint
- Complainant details (for example name, contact details)
- Location details
- Type of complaint – you may wish to apply themes or topics
- Date complaint received
- Date complaint acknowledged
- Investigator name
- Date response due
- Date response sent
- Details of any escalation beyond the initial response (this may be multiple fields – e.g. date and details of additional correspondence, date referred to commissioner).
- Decision/ outcome
- Outcome description (what happened)
- Any learning
- Any actions
- Date case closed

Complaints usually involve lots of correspondence so ensure you have a robust system for filing complaints documents within or alongside your general recording (link files together using file references if necessary).

Reporting individual complaints

Some types of complaints will need to be reported to the commissioner when they happen. If this is required it will be included in your contract and/or highlighted by your commissioner as something that needs to be introduced. Many types of services may wish to refer a complaint to the commissioner if they fall within the commissioner's remit and cannot be responded to by the service provider. That may include complaints relating to, for example:

- levels of funding for the organisation
- policy set by the commissioning body
- decisions made by the commissioner
- issues relating to the way in which the service is specified within the contract

Social care services, covered by different forms of legislation and complaints regulations, may be required to report all complaints to the commissioner as they are made. This will usually be the case if the commissioning body has placed someone in the care of the service provider or if there are safeguarding concerns that need to be raised (this will be assessed and either issues taken through the safeguarding process or taken as formal complaints). The way in which individual complaints will be reported to, and handled by, the commissioning body should be clearly outlined within your complaints procedure. The commissioner would usually expect you to provide a comprehensive stage 1 response for them to review.

Monitoring

You can check your complaints handling processes are effective by monitoring and internally reporting some key measures. You may choose different numbers of measures depending on the size of your organisation and the volume of complaints you receive. Example measures include:

- Overall complaint numbers
- Complaints by month/quarter/year
- The average time taken to acknowledge complaints
- The average time taken to respond to a complaint
- The proportion of complaints by type (to determine whether there are patterns and whether improvement is required in any particular elements of service provision).
- Complaints by location (if the service is delivered in multiple locations there may be issues in some areas and not in others).
- The proportion of complaints upheld.
- The proportion of complaints escalating beyond the initial response.

You should also try to monitor positive comments such as compliments to ensure you have a balanced view of all customer feedback.

Annual reporting

Although you may report internally within your organisation and to your commissioner(s) on a regular basis, you may decide to report widely once a year. Annual reports are commonly used to report customer feedback to members of the public. It is good practice to openly report on complaints and customer feedback. You could consider including the following information in your annual report or producing a separate customer feedback report including:

- The number of complaints received
- The outcome of complaints (e.g. the proportion upheld).
- Complaint Themes
- What the organisation has learnt from complaints and the changes made as a result
- Compliments
- Example compliments – such as quotes.

Assessment Reporting

Your service may be externally assessed/reviewed and rated. This may be through a formal process or informally through social media and other forms of customer feedback. Be open and transparent with your commissioner and report this feedback alongside your agreed performance measures. If positive, it is great news and should be highlighted. If you have had negative feedback or reports then your commissioner will be interested in how you plan to address those concerns and implement actions to secure service improvements. Your commissioner may be able to assist using their knowledge of good practice.

As well as reporting to customers and commissioners don't forget to report back to your staff and/or volunteers. A complaints system can generate positive improvements and staff will be keen to learn how complaints have turned into positive actions and supported the development of better services.