



Get the most out of  
**Glasgowlife**<sup>™</sup>

# Comments, Compliments and Complaints Policy

# **Glasgow Life**

## **Comments, Compliments and Complaints Policy**

### **1. Introduction**

Glasgow Life is committed to delivering high quality services that enriches the lives of all of Glasgow's citizens and visitors alike. We want to enhance our customers experience through culture, sport and learning so that it has a positive impact on their lives and inspires them to be all that they can be.

Glasgow Life recognises all users and potential users of its services as customers. This includes paying and non-paying customers, learners, participants, visitors and audiences. In essence, Glasgow Life customers are the city's citizens and visitors. Customers may also be Glasgow Life staff.

### **2. Aim of the Policy**

Glasgow Life aims to put customers at the very heart of the way we develop our services. Customer comments are part of our ongoing consultation process and we value this feedback, to learn lessons and help drive forward service improvements.

Comments are received from customers in a variety of ways; Customer Comment Cards, letters, via email, Glasgow Life website, face to face contact and social networking feedback.

The aim of this policy is to ensure that:

- comments are also valued and acted upon.
- complaints are dealt with quickly, effectively and in a transparent way
- responses are fair, proportionate and handled in a consistent manner
- it is user focused and accessible.

This document sets out how we manage and respond to comments, compliments and complaints. It complies with the Scottish Public Services Ombudsman guidance and Glasgow City Council requirements for handling complaints.

### **3. What are comments, compliments and complaints?**

Glasgow Life welcomes comments and suggestions for improvements to services as well as compliments our customers wish to make. A comment is normally a personal opinion or belief, feedback or remark expressed by customers and users. Likewise, positive recognition from customers for a job well

done by individual employees or the way services are delivered is considered to be a compliment.

We regard a complaint as any expression of dissatisfaction by one or more members of the public about Glasgow Life's action or lack of action, or about the standard of service provided by or on behalf of Glasgow Life.

A complaint may relate to:

- failure to provide a service
- inadequate standard of service
- treatment by or attitude of a member of staff
- the failure of Glasgow Life employees to follow agreed policies and procedures
- dissatisfaction with Glasgow Life policies/procedures.

This list illustrates some examples of complaints we may receive, but does not cover everything.

A complaint is not:

- a routine first-time request for a service
- a request for compensation from Glasgow Life
- an attempt to re-open a previously concluded complaint or to have a complaint reconsidered where we have already given our final decision
- a Freedom of Information request
- a data protection request
- an insurance claim.

Customers will be directed to use the appropriate procedures in relation to these issues.

#### **4. Handling comments, compliments and complaints**

Where a suggestion is made to improve services or an enquiry is received, staff record details and process them via our electronic comments system. These may be received by any staff member within Glasgow Life via a comments card, a letter, by phone, in person or via the online form, as per contact details in section 7 below. Feedback is provided to the customer if appropriate. Where a compliment is received feedback will be provided to the staff member or service as appropriate.

If a comment or complaint is received at any venue regarding catering and hospitality, which is delivered by Encore Hospitality Services, Glasgow Life will deal with these and communicate with the customer as appropriate in line with our Comments, Compliments and Complaints Policy.

If a complaint relates to the actions of Glasgow Life and one or more local authority services or other armed-length organisations, the customer will be allocated a complaint owner, and advised that they will receive one response covering all the issues raised. If there are no actions for Glasgow Life details will be recorded then forwarded onto the appropriate service for action.

Our complaints procedure has two stages. Frontline resolution is the first stage. If a complaint is not resolved it goes to the second stage where complaints are investigated. However we anticipate that the majority of complaints will be resolved at Stage one: frontline resolution.

If the customer refuses to take part in the frontline resolution process or remains dissatisfied after this Stage, they can request that it proceeds to Stage two: investigation.

This may be immediately on communicating the decision at the frontline stage or could be some time later. If the complaint is complex or of a more serious nature e.g. a vulnerable person, press interest, it will be progressed to Stage two: investigation immediately.

Where it relates to an incident or dangerous occurrence, (e.g. it involves Child Protection Act, Health and Safety at work etc.), the procedure for Child Protection or Incident & Dangerous Occurrence will be followed, (see section 10 below).

Complaints can be made in writing, in person, by telephone, by email or online (see Section 7 below). However, frontline resolution will always be considered regardless of how the complaint is received. We will always ask the customer for:

- their full name and address
- date/time of the incident
- as much about the complaint as possible
- what has gone wrong, and
- how they want us to resolve the matter.

Customers will also be requested to provide equality monitoring information to help Glasgow Life make sure that all groups of people have the opportunity to access and use the complaints procedure, and are treated fairly. This, however, is voluntary and customers do not need to provide this.

### **Stage one: frontline resolution**

Glasgow Life employees will deal with the majority of issues that customers raise, quickly and informally. Frontline staff will aim to resolve issues at the point of service delivery, **within five working days or less**, unless there are exceptional circumstances. Generally these will be straightforward complaints that can be resolved 'on the spot' with an apology and action to put the matter

right, or other action can be taken to resolve the complaint quickly by involving supervisory/managerial staff as appropriate.

Glasgow Life staff will endeavour to resolve many of the complaints, face to face or by telephone, without the need to respond in writing. However, sometimes the decision may be put in writing, if the customer asks for this and that it will help to confirm or clarify the facts or outcome of the complaint for the customer, or the company. This may be emailed if we have the customers email addresses.

Details of the complaint, the action taken and the final outcome will be recorded on our electronic complaints system.

Where it is likely that the complaint will be resolved at Stage one: frontline resolution but needs more time, (for example a staff member is temporarily unavailable) an extension may be agreed by senior management of no more than **five working days**. If the customer does not agree to an extension but it is unavoidable and reasonable, the senior manager will tell the customer about the delay and explain the reason for the decision to grant the extension.

All extensions will be monitored quarterly so that they do not become the norm. All attempts to resolve the complaint at this stage will take no longer than **ten working days** from the date the complaint is received.

### **Stage two: investigation**

Complaints that reach this stage have not been resolved at Stage one: frontline resolution or are so complex that they need investigation before a decision can be provided.

Overall responsibility and accountability for the management of complaints lies with Glasgow Life's Chief Executive and the Senior Management Team. The customer will be provided with the name and contact details of the person involved in the investigation and in coordinating all aspects of the response. Senior management, on behalf of the Chief Executive, will be involved in overseeing the handling of the complaint including signing-off complaints, approving extensions to timescales, and restricting access to staff where customers are unreasonable (see Section 9 below). If complaints are raised against senior staff, the investigation will be conducted by an individual who is independent of the situation.

When dealing with complaints at this stage we will:

- record the complaint at Stage two: investigation - where appropriate, this will be done as a continuation of Stage One: frontline resolution
- acknowledge receipt of the complaint within **three working days** in writing
- gather additional information and discuss the complaint with the customer to understand the reasons for it and what outcomes they want – this may

involve managing the customer's expectations of how we might be able to resolve the complaint

- provide a response containing details of the investigation and the outcome as soon as possible but no later than **20 working days** - either upholding the complaint or rejecting the case, with a full written explanation of the company's position
- provide advice on their right to ask the Scottish Public Services Ombudsman to consider their complaint if they remain dissatisfied.

The Scottish Public Services Ombudsman guidance states that complaints should normally be made within six months of the event that the customer wishes to complain about, or when finding out that they have a reason to complain, but no longer than 12 months after the event itself unless there are special circumstances.

Where a complaint investigation identifies that we have in some way failed to provide the service that we should have provided, appropriate actions will be determined in a fair and reasonable manner to help remedy the situation e.g. an apology, an explanation of what went wrong, measures to put things right, offer of redress, or why Glasgow Life is unable to assist. Where measures are identified to put things right we will include details of what will be done and when this will happen, and a named officer (or team) will be designated with the responsibility for implementing the measures. Any financial redress will take account of the time and trouble incurred by the customer in pursuing the complaint.

Details of the outcome and the action taken will be recorded in our electronic complaints system, including details of how it was communicated to the customer.

If our investigations take longer than **20 working days** to complete due to exceptional circumstances (e.g. due to sickness or leave, the customer has agreed to mediation to resolve the complaint, or further information required but not available within current timescale), we will agree revised time limits with the customer and keep them updated on progress. Again, any extensions will be monitored and should not become the norm. The proportion of complaints that exceed the 20-day limit will be monitored by our senior management team on a quarterly basis.

A senior manager will decide on the extension where the customer disagrees with revised time limits.

## **5. Anonymous Complaints**

If complaints are received anonymously we will consider them where there is enough information in the complaint to enable us to make further enquiries. Any decision not to pursue an anonymous complaint will be authorised by a senior manager. If anonymous complaints make serious allegations, this will be referred to a senior officer immediately.

Where a customer has expressed dissatisfaction in line with our definition of a complaint but does not want to complain, we will encourage them to submit their complaint. However, if they still do not wish to complain we will record the issue as an anonymous complaint.

## **6. Recording comments, compliments and complaints**

All comments, compliments and complaints are recorded in our electronic systems. The information recorded is in line with the Scottish Public Services Ombudsman requirements and sufficiently detailed to allow follow-up action to be taken to improve services and prevent a recurrence of any issues identified e.g. the customer details, the issues raised, all relevant dates of action taken and outcome of the case. It also contains space for notes of any meetings and telephone calls, email correspondence with the customer and any internal communications with staff about the investigation.

We will ensure that the principles of the Data Protection Act 2018 and the Human Rights Act 1998 are adhered to in relation to retaining personal information and providing a fair and accessible procedure.

Information provided by the customer will be used by Glasgow Life in order to deal with customer comments or complaints, and to let them know what the outcome of this is. The customer will be informed that information requested in relation to protected characteristics is optional and will be used solely for statistical purposes and to comply with the company's statutory obligations to secure equality of opportunity.

Personal information will not be disclosed to any outside person or organisation, except where the customer names them in their comment or complaint, or we are required to do so or permitted by law. Personal information however will be shared with any organisation named in the customer's comment or complaint. We are committed to providing high quality services to all.

Where we need to make enquiries to another agency we will take account of the Information Commissioner's guidance on data sharing. We will also adopt the Scottish Council's Archives guidance on five year file retention.

No personal details of any customer will be published by Glasgow Life, however improvements made as a result of customer comments will be displayed in venues.

## **7. Promoting equality of access**

Glasgow Life is committed to ensuring that all people are given full and equal access to make comments, compliments or complaints. At Stage one: frontline resolution, we will accept complaints in the following way:

- by telephone or by face-to-face at service point of contact;
- by completing a Customers Comments Card (and posting it in the mailbox at reception), available in all Glasgow Life facilities; or downloading from [www.glasgowlife.org.uk](http://www.glasgowlife.org.uk) and returning to: Freepost GW8140, Glasgow Life, Glasgow G1 1LH;
- by writing to the Administrative Hub, Glasgow Life, Commonwealth House, 38 Albion Street, Glasgow G1 1LH or by email at [info@glasgowlife.org.uk](mailto: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>

Where complaints are received centrally via the Administrative Hub, or for the attention of the Chief Executive, these will be cascaded to the appropriate service or officer for the complaint to be dealt with in line with the complaints procedure or for information.

If customers are unsure about how to make a complaint or need any assistance, they should speak to a member of staff at the venue.

Glasgow Life will also make sure, when requested, to:

- provide assistance to people who have difficulty with spoken English or whose first language is not English
- provide support for visually impaired customers
- arrange sign language interpretation when appropriate
- make sure that the Customer Comments Card is available in other formats on request
- accept and respond to correspondence in alternative formats (e.g. large print, audiotape, computer disc, community languages and in Braille).

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.



Where a customer is unable, or reluctant, to make a complaint on their own we will accept complaints brought by third parties as long as they obtain appropriate personal consent from the customer. A mandate is required to confirm personal consent.

Customers can also contact the Scottish Independent Advocacy Alliance, their Citizen's Advice Bureau or their local Councillor, MP or MSP for help or support with their complaint at any stage. Names of elected representatives can be found by visiting Glasgow City Council's website [www.glasgow.gov.uk](http://www.glasgow.gov.uk) or by phoning 0141 287 2000 (Council switchboard). The Scottish Public Services Ombudsman can be contacted at: Bridgeside House, 99 McDonald Road, Edinburgh, EH7 4NS. Tel no: 0800 377 7330 or online contact [www.spsso.org.uk/contact-us](http://www.spsso.org.uk/contact-us) (Mobile site: <http://m.spsso.org.uk>)

## **8. Evaluation and monitoring**

Glasgow Life's Business & Strategy Team will provide the Senior Management Team with performance reports from the electronic system in line with Key Performance Indicators recommended by the Scottish Public Services Ombudsman.

We also report on our performance in handling complaints in line with the Scottish Public Services Ombudsman requirements. This includes performance statistics showing the volumes and types of complaints and key performance details. The report will be published on Glasgow Life's website.

A random sample of customers will be contacted after a complaint has been dealt with to complete a satisfaction form. The aim of this form is to provide information to help Glasgow Life determine whether the complaint procedure was accessible and easy to use, and assess the levels of satisfaction with the way the complaint was handled and with the action taken.

Details of service improvements made as a result of feedback from customers will be gathered by the Business and Strategy Team and will be incorporated within the company's annual performance report.

The policy will be reviewed on a regular basis for any minor issues, and more formally every three years to ensure that it reflects best practice, and is operating in accordance with the Scottish Public Services Ombudsman guidance and Glasgow City Council.

## **9. Managing unacceptable behaviour**

As with other aspects of this policy Glasgow Life follows guidance issued by the Scottish Public Services Ombudsman, including guidance issued relating to unreasonable or demanding behaviour.

People may act out of character in times of trouble or distress. There may have been upsetting or distressing circumstances leading up to a customer coming to us. This may contribute to the way in which they express themselves when they present their complaint, which we may consider as being unacceptable. Nonetheless their grievance may still be legitimate that requires proper consideration.

Persistent behaviour may be someone continually complaining in person or through repeated letters of complaint or phone calls about the same issue. Demanding behaviour may be someone expecting a response within unreasonable time-scales; insisting on seeing or speaking to a particular member of staff; or repeatedly changing the substance of the complaint, or raising unrelated concerns.

We expect our staff to be treated courteously and with respect. Violence or abuse towards staff is unacceptable, including anger when it escalates into aggression towards staff.

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.

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 as a result of their behaviour. We will, therefore, apply our policies and procedures to protect staff 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. (This is outlined in Appendix 1 of this document).

## **10. Issues that fall outside of this policy**

Certain types of complaint are not dealt with by the complaints policy. Complaints by Glasgow Life employees - unless they are made as customers – are more appropriate to be dealt with under the company's Human Resources policies and procedures, our Anti-Harassment procedure and procedures covering use of social media.

Where appropriate, Glasgow Life will always respect the confidentiality of a customer. However, confidentiality is not an absolute obligation where there is an overriding public interest, such as protecting someone else from harm. We will involve the police or associated agencies in cases where it is believed that a complainant has committed a criminal offence (for example, assault of an employee or criminal damage), where assault is threatened or where a complainant refuses to leave Glasgow Life premises.

Incidents that relate to child protection issues will be dealt with through the company's record and refer processes as set out in the company's Child Protection Policy.

Hate crime incidents that occur on Glasgow Life premises are reported via our Hate Incident Procedure. Incidents that are not related to Glasgow Life services or the conduct of Glasgow Life employees should be reported via a third party reporting centre or Police Scotland online reporting form. A hate crime incident is any incident which is perceived by the victim or any other person to be motivated by prejudice against someone's sex, racial heritage, religion, disability or sexual orientation. A list of these agencies, as well as an electronic remote reporting form, is accessible on the Police Scotland website.

<http://www.scotland.police.uk/forces-welcome>

Further information, together with leaflets in community languages is available on: <http://www.saferglasgow.com/corporate/hate-crime.aspx>

or by phoning the Hate Crime Officer on 0141 276 7494.

## **11. Staff Training**

Staff who have a specific role in implementing the complaints handling procedure will be provided with suitable training so that they understand their role and responsibilities. As a complaint may be made to any member of staff in Glasgow Life all staff will be made aware of the complaints handling procedure and how to access support.

The policy will be published to all our staff and built into induction and customer service training with the aim of empowering staff to resolve complaints, where it

is possible and practical for staff to do so, starting with the first point of contact with customers.

Staff with responsibility for investigating complaints will have a thorough understanding of the complaints procedure and a reasonable knowledge of the procedures of the service or function under investigation. They will be fully trained in how to plan and conduct investigations, including how to obtain and analyse evidence.

Managers will have a responsibility to inform, support and monitor staff to ensure that the policy and procedure is properly implemented and that all staff are aware of the stages of the complaints procedure and the person responsible for coordinating complaints within their service area.

Staff handling the complaint will have access to information on Data Protection and Freedom of Information law and practice and will be aware of the expectations of the public in respect of their information.

## **12. Publicising the policy**

We will publicise the comments, compliments and complaints policy using comments cards, posters, and will be clearly visible on the company's website. There will be one standard Glasgow Life comments card and poster for use by all Glasgow Life services. These will be prominently displayed in all venues. All publicity material will be presented in plain English and available, on request, in alternative formats including large print, community languages, and Braille.

## **Appendix 1: Procedure to manage unacceptable behaviour**

Where we decide that someone is unreasonably persistent or demanding the action we take will be appropriate and proportionate to restrict access to protect staff from unacceptable behaviour such as unreasonable persistence, threats or offensive behaviour from customers.

### **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 deal with 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.

### **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.

### **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.

### **Recording incidents**

We record all incidents of unacceptable actions by customers. Where it is decided to restrict customer contact, an entry noting this will be made in the relevant file in the electronic system. A decision to restrict contact may be reconsidered if the customer demonstrates a more acceptable approach.

### **Monitoring arrangements**

The Senior Management Team reviews the status of all customers with restricted contact arrangements on a regular basis. Similarly, our approach to managing unacceptable behaviour is monitored to ensure it reflects the nature and extent of unacceptable actions.