



Complaints & Compliments Policy

March 2024

Responsible	Business Services	
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1. Purpose & Scope

- 1.1 CPL Group is committed to providing a robust complaints and compliments service which provides a fair and impartial approach to consistently managing all feedback that the Group receives.
- 1.2 All feedback regarding the Group, whether a complaint or a compliment is an opportunity to further enhance the Group's portfolio of services whilst steering service improvements. This policy will aim to put things right if they go wrong on a first-time fix and will act promptly to provide a resolution for the complainant.
- 1.3 The service will be governed by three guiding principles when dealing with complaints.
 - Be Fair
 - Put things right
 - Adapt and improve processes
- 1.4 This policy covers all associated stakeholders which includes members, suppliers, partners, and wider stakeholders or an advocate authorised to act on their behalf, who has experienced a service delivered by the Group, or one of its approved partners. Non-customers may also use the policy should they have been impacted by any decisions or actions taken by the Group.
- 1.5 Changes to services arising from feedback will be published using the Group's website, newsletters, and social media channels.

2. Aim of this policy

- 2.1 The aim of this policy is to provide a fair, consistent and structured process, for members, suppliers and wider stakeholders, if they are dissatisfied with a service they have received or if they want to pass on a compliment.
- 2.2 The Group will ensure all complaints are treated fairly, efficiently, and as confidentially as possible, only disclosing information if necessary to thoroughly investigate and in compliance with the Data Protection Policy and Data Strategy.

3. Definitions

Complaint

- 3.1 A Complaint is defined as "An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by us, our employees, or those acting on

our behalf, affecting our members or suppliers” A complaint would cover but is not limited to.

- failure to act within policy or practice
- failure to provide services
- failure to achieve service standards

Compliment

3.2 A compliment is a polite expression of praise, admiration or gratitude about a service, supplier, or an employee.

4. Roles and responsibilities

- 4.1 The Group Leadership Team is responsible for ensuring this policy is effectively managed by all employees.
- 4.2 Managers must be trained in handling complaints and compliments to ensure a consistent approach and to affect a satisfactory resolution.
- 4.3 The Business Services Team will receive and record all complaints and compliments in the register and will coordinate the follow up action to conclusion.
- 4.4 Employees within the Group must ensure that any actions within this policy are carried out appropriately and that all stakeholders which include members, suppliers and partners are dealt with in a respectful and responsive way.

5. Refusal of a complaint

- 5.1 Complaints will not be considered for:
 - Issues raised more than six months after the relevant event (unless it is an on-going issue the Group is aware of).
 - Matters that have previously been considered under this policy and as such this policy being exhausted.
 - Cases where legal proceedings have started, or a final legal decision has been made.
 - Any complaints received regarding serious allegations against employees, will be escalated and managed through the Group’s Disciplinary Policy. Such outcomes would not be shared with the complainant under GDPR.
 - Allegations of Data Breaches or issues relating to Subject Access Requests are managed through the Group’s Data Protection Policy and any investigation managed by the Data Protection Officer.

This list is not exhaustive.

- 5.2 When a complaint is not to be considered, a detailed explanation will be provided, setting out the reasons why the matter is not suitable for the complaints process.
- 5.3 Where a complainant wants to pursue the complaint through legal recourse or where a legal route is the most appropriate course of action, the complaint ceases to be part of the complaints process and will be dealt with by our legal advisors. The complainant will be advised of this in writing and no further action will be taken under the Complaints Policy. Any additional information requests in relation to the complaint will be acknowledged only and referred to the relevant legal advisor.

6. How to make a complaint

- 6.1 There are a variety of ways to enable stakeholders to make a complaint or provide a compliment.
- In writing to Procurement House, Unit 23, Lesley Hough Way, Salford, Manchester, M6 6AJ.
 - Online – through the website via an online form (see Appendix A)
 - By telephone call to the Helpdesk on 0800 066 2188.
- 6.2 A copy of this policy will be made available on the website.

7. Complaint Management Process

- 7.1 This policy will apply to all feedback that the Group receives except for any complaint which falls within the categories listed in Section 5.
- 7.2 When a complaint is received, it will be logged by the Business Services Team who will pass the details to the manager of the team, process or employee that the complaint refers to.

Formal Stage 1 – fact finding and response (First Time Fix)

- 7.3 The manager, who is responsible for the service area for which the complaint is received, will perform the following steps, supported where necessary by their Head of service.
1. Contact the complainant to acknowledge receipt of the complaint and request an appropriate time to discuss the complaint in more detail.
 2. Take note of the details of the complaint to understand what the problem is.
 3. Based on the details provided discuss options for fixing the issue and ascertain what type of resolution the complainant is looking for.
 4. Assess and investigate the complaint.
 5. Provide a written response detailing the outcome of the investigation and any corrective actions or measures taken to prevent the same issue in the future.

- 7.4 The written response should be made within 10 working days of the original complaint.
- 7.5 The manager notifies the Business Services Team who update the complaints register.
- 7.6 If the complainant is not satisfied with the outcome or response the complaint will be escalated to stage 2.

Formal stage 2 – Formal investigation

- 7.7 If the complaint has not been resolved under stage 1, or the complainant is unhappy with the outcome the complaint can be escalated to stage 2.
- 7.8 Stage 2 is a request for a formal investigation and is managed by the Head of service of a different team to the investigating team in Stage 1.
- 7.9 Stage 2 is a comprehensive reconsideration of the complaint. Contact with the complainant will be made via the phone, or chosen method of communication, to discuss the complaint and desired outcome. The original investigation is reviewed with the outcome being a formal written report of the review.
- 7.10 The written response should be made within 10 working days of the escalation to Stage 2. The complainant will be provided, within the written response with the contact details of the Charity Commission should they wish to progress the complaint further.
- 7.11 The head of service notifies the Business Services Team who update the complaints register.
- 7.12 The complainant must be informed immediately of any delays during Stage 1 or stage 2 due to the complexity of the complaint/investigation.

8. Compliance

- 8.1 In compliance with the Equality Act 2010, this policy ensures that all complainants are treated and respected the same, regardless of their circumstances and protected characteristics.
- 8.2 This guidance should be read in conjunction with other legislation and guidance relevant to the handling of feedback from customers such as:
 - Data Protection Act 1998
 - Freedom of Information Act 2000

9. Data protection

- 9.1 The process of personal data collected as part of this policy is in accordance with the group's Data Protection Policy. Data collected as part of this policy is held securely and accessed by and disclosed to, individuals only for the purposes of legal compliance.

Employees should immediately report any inappropriate access or disclosure of employee data in accordance with the group's Data Protection Policy as this constitutes a data protection breach.

10. Equality, diversity and inclusion

- 10.1 CPL is an equal opportunity employer. This is not only a legal requirement underpinned by the Equality Act 2010 but also a commitment from the group. As an employer, the group embraces equality, diversity and inclusion (EDI) and seeks to ensure that its policies are free from unlawful or unfair discrimination and underpin the group's values.

11. Related Policies

- 11.1 The following policies in conjunction with this policy are available to all employees.

- Data protection policy
- Equality, diversity, and inclusion policy
- Code of conduct
- Code of ethics

Appendix A – Online Complaint and Compliment Form

Name: _____

Company / Institution: _____

Position: _____

Contact details: Email: _____ Telephone: _____

Details of Complaint or compliment