



## Customer Complaint Policy

### POLICY STATEMENT

Inverness Leisure aims to provide its customers, partners and suppliers (our stakeholders) with an excellent customer service. The Organisation will listen to the needs of our stakeholders and provide opportunities for feedback.

### 1. INTRODUCTION

Inverness Leisure wishes to put customer needs at the very heart of the way we develop and enhance our services. Customer feedback is part of our ongoing consultation process which we will use to learn and continuously improve our service.

We will promote the use of customer feedback via our comments system, customer surveys, mystery shoppers, social media, website and face-to-face interaction. Customer feedback will be analysed and viewed as an opportunity to assist in continuous improvement of our service.

The Inverness Leisure Mission Statement & Customer Promise document will underpin our service delivery in line with the values, aims and objectives of the company.

We will ensure that all our associates are trained and therefore competent in the delivery of excellent customer service and are fully aware of the relevant company policies and procedures. Associates will be encouraged to respond positively, be problem solvers and successfully resolve any issues as quickly as possible, and to refer on those which are more complex or remain unresolved.

### 2. REFERENCE DOCUMENTS

#### INTERNAL

Inverness Leisure Mission Statement & Customer Promise  
Customer Comment Response Procedure FAA - 1075  
Customer Comments Database (CFS)

#### EXTERNAL

SPSO Guidance on a Model Complaints Handling Procedure  
Data Protection Act 1998  
Personal Safety at Work H&S 2.29

### 3. WHAT IS A COMPLAINT?

*An expression of dissatisfaction by one or more people about the standard of service provided by Inverness Leisure.*

A complaint may relate to:

- Failure to provide a service
- Inadequate standard of service
- Dissatisfaction with company policy
- Treatment by or attitude of a member of staff

This list does not cover everything. A customer might say they 'don't want to complain' but go on to express dissatisfaction in a way that amounts to a complaint. The customer will be told that we will consider all expressions of dissatisfaction and that complaints provide us with an opportunity to improve services, especially where things have gone wrong. We will record all complaints on our Customer First Solutions (CFS) database and regularly review them to identify trends and opportunities for service development.

#### 4. THE COMPLAINTS HANDLING PROCESS

A complaint can be made in person (face-to-face or by phone); in writing (by letter or email); via our comment collection system; via our social media or web sites; an elected member of Highland Council, an MSP, an MP or another external party. We will record all complaints on our CFS database and regularly review them to identify trends and opportunities for service development.

##### STAGE 1

Wherever possible, an employee will deal quickly and informally with any issue or complaint from a customer. This is only likely to be possible if the complaint is made in person. Frontline staff will aim to resolve the matter at the point of service delivery and (if necessary) involve the Duty Officer/Manager as appropriate. All frontline staff will be aware of, and be trained in, the operation of the complaints handling process and be empowered to deal with and resolve complaints as they arise.

Examples of issues suitable for frontline resolution:

- The late or unexpected cancellation of a class or activity
- Changing areas are not of an acceptable standard or lockers are broken
- Failure to respond to a request to change the status of a membership
- A member of staff was unhelpful
- A customer arrived for an activity only to find the booking had not been processed correctly

Any complaints received in relation to catering or vending will be directed towards the Catering Officer, when on duty, or otherwise to the member of staff allocated to cover.

If a complaint cannot be resolved at the point of delivery or is inappropriate for this stage, the complainant will be invited to refer their comment or complaint in writing to the Customer Service & Events Officer either using the on-site comment collection point or by email or letter. The appropriate contact details should be given to the complainant if resolution is not achieved by frontline staff or Duty Officer/Manager.

All complaints should be acknowledged in writing within 3 days.

#### Complaints requiring little or no Investigation

For issues which are straightforward and require little or no investigation, provide an apology (if appropriate), explanation or other action to try to resolve the complaint within 48 hours or less. Responses will normally be by email or letter.

The Customer Service & Events Officer can deal with the complaint themselves or invite a member of the Duty Manager/Officer team to deal with the complaint, however the fewer people that are involved in responding to a complaint and the quicker the response is given the better. Employees are empowered to provide a level of service recovery which is appropriate and proportionate to resolving the complaint.

#### Complaints that require an Investigation

Complaints handled by investigation are typically those that are complex or require examination to establish the relevant facts before a response can be given. In such cases the Customer Service & Events Officer will nominate a person to carry out the investigation or for complex or sensitive cases seek advice from the Operations Manager or Head of Operations. An acknowledgement will be given within 3 days of receiving the written complaint and a definitive response provided within 20 days following a thorough investigation of the points raised. Sensitive complaints may require an additional internal review. Responses will be issued by the Customer Service & Events Officer. If a full response cannot be given within 20 days the complainant must be advised within the 20 days that a longer time is required and given an indication of when to expect a full response. Responses will normally be by email or letter.

Examples of issues suitable for investigation:

- Frontline resolution was attempted but the customer remains dissatisfied.
- The customer refuses to engage with the frontline resolution process.
- The issues raised are complex and will require detailed investigation.
- The complaint relates to issues that have been identified as serious or high risk/high profile.

At the investigation stage, staff should aim to resolve the complaint first time. The goal is to establish all of the facts relevant to the points raised and provide a full, objective and proportionate response to the customer's complaint.

## Complaints going straight to Stage 2

Some complaints will go straight to Stage 2 (i.e. by-pass Stage 1). Examples of this would be:

- When the complainant doesn't want to engage face to face with frontline staff.
- When the complainant would prefer to put their complaint in writing to a higher authority.
- For more serious issues that require senior managerial input.

It is for the complainant to decide what they would prefer to do.

## Complaints that do not relate to the facility - go straight to Stage 2

If the complaint does not relate to the facility (e.g. it is about a company matter) the complainant should be advised to write to the Chief Executive, who will either deal with the matter himself or delegate to an appropriate person. Again, an acknowledgement will be given within 3 days of receiving the written complaint and a definitive response provided within 20 days following a thorough investigation of the points raised. If a full response cannot be given within 20 days the complainant must be advised within the 20 days that a longer time is required and given an indication of when to expect a full response. Responses will normally be by email or letter.

If a complaint cannot be resolved at the point of delivery or is inappropriate for this stage, proceed to Stage 2.

## **STAGE 2**

Where the customer remains dissatisfied with the response or the way the complaint has been dealt with, it can be escalated to the Chief Executive. The Chief Executive may review the complaint himself or invite a member of the Senior Management Team to review it for him. Either way the Chief Executive will acknowledge the complainants (escalated) letter within 3 days and provide a full response within 20 days. If a full response cannot be given within 20 days the complainant must be advised within the 20 days that a longer time is required and given an indication of when to expect a full response. Responses will normally be by email or letter.

Complainants may also complain directly to the Chief Executive when the investigation would be carried out at the appropriate level determined by the Chief Executive.

All complaints from MSPs, MPs, Highland Councillors/Officers or via the media would be dealt with by the Chief Executive.

If the Chief Executive has been involved in the investigation, the complaint will go straight to Stage 3.

### STAGE 3

Where the customer remains dissatisfied with the response or the way the complaint has been dealt with, it can be escalated to the Company Chair. They may review the complaint themselves or invite one or other trustees to review it on their behalf. Either way the Chair will acknowledge the complainants (escalated) letter within 3 days and provide a full response within 20 days. If a full response cannot be given within 20 days the complainant must be advised within the 20 days that a longer time is required and given an indication of when to expect a full response. Responses will normally be by email or letter.

Complainants may also complain directly to the Board of Trustees when the investigation would be carried out at the appropriate level determined by the Board.

### STAGE 4

If the complainant remains unsatisfied after the escalated response they have the right to refer their complaint to the Scottish Public Services Ombudsman (SPSO). Complaints progressing to the SPSO will have been thoroughly investigated by Inverness Leisure but not resolved to the complainant's satisfaction.

The Scottish Public Sector Ombudsman will assess whether there is evidence of service failure or maladministration not identified by Inverness Leisure.

Complainants can contact SPSO via their web site [www.spsso.org.uk](http://www.spsso.org.uk) or use their freephone telephone 0800 377 7330 for advice.

Where a complaint investigation identifies a failing in our service, appropriate actions will be determined in a fair and reasonable manner to assist in remedying the situation e.g. an apology, an explanation of what went wrong, measures to put things right, offer of redress or why on this occasion Inverness Leisure may not be able to assist.

Some types of complaints are not easily resolved through written correspondence. Staff will be aware of different forms of dispute resolution available, such as mediation or conciliation which can be highly effective and help defuse problems before they escalate.

If a complaint relates to a partner organisation the complaint will be forwarded to the relevant contact and the customer will be informed of the action.

At each stage of the process the complainant will be advised how to escalate their complaint should they be dissatisfied with the response.

A summary version of this 5 stage process is attached at Appendix A.

## 5. RECORDING AND LEARNING

Details of the complaint and actions taken will be recorded on Inverness Leisure's customer feedback database (CRS) to assist with monitoring and improving our service. This database is password protected and accessible only by nominated Managers and Duty Officers. The Admin & IT Manager manages the administration of the software and controls access.

Weekly and monthly performance reports are extracted from the data base, providing details of each complaint and performance scores, which are set against the company key performance indicators.

We will ensure that the principles of the Data protection Act 1998 are adhered to in relation to retaining personal information and providing a fair and accessible procedure. Whilst no personal details of any customer will be published by Inverness Leisure, improvements made as a result of customer comments will be displayed on our website.

## 6. ENCOURAGING FEEDBACK

Inverness Leisure is committed to ensuring that all people are given full and equal access to give feedback. We will accept comments in the following ways:

- By telephone or by face-to-face at point of service delivery.
- Via our customer comment collection system.
- Via our web site [www.invernessleisure.co.uk](http://www.invernessleisure.co.uk) and selecting the 'contact us' tab.
- By emailing the Customer service & Events Officer directly on [info@invernessleisure.co.uk](mailto:info@invernessleisure.co.uk).
- By writing to the Customer Service & Events Officer, Inverness Leisure, Bught Lane, Inverness, Highland, IV3 5SS.
- Via a third party such as Highland Council, MP or MSP.

Where customers cannot provide the complaint in writing, a member of staff will assist the customer in compiling an accurate record of the complaint.

Inverness Leisure will also make sure, where necessary, 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 and when prearranged.

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 consent from the customer.

## **7. EVALUATION AND MONITORING**

The Senior Management team will review regular reports from the electronic Customer Comments System. The reports will analyse all comments and collate service ratings for each of the sites and business as a whole.

A summary report is presented bi-annually to the Board of Trustees.

Details of the service ratings will be incorporated with the company's annual performance reports. Performance targets will be set each year, to help maximise our goal of continuous service improvement.

## **8. UNREASONABLY PERSISTENT OR DEMANDING COMPLAINANTS**

Inverness Leisure wants to ensure that complainants 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 do not suffer any detriment as a result of their behaviour.

Persistent behaviour may be someone complaining in person or through repeated letters/emails 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.

Where we find that someone is unreasonably persistent or demanding the action we take will be appropriate and proportionate. This may mean that we apply restrictions, such as communicating via letter only or restricting telephone calls to specified times with a named person. We will aim to do this in a way, wherever possible, that allows a complaint to progress to completion through our complaints process. If such problems arise they should be referred to Head of Finance & Administration who shall make the decision as to when communication is restricted with regards to persistent and demanding complainants.

If a decision is taken to apply restrictions, the Senior Management Team may write to inform the complainant why we believe the behaviour is considered unreasonably persistent or overly demanding, what action we are taking and the duration of that action. Alternatively, a member of the Senior Management Team may convene a meeting directly with the complainant to discuss the complaint. This will be followed by a letter to clarify the outcome.

Inverness Leisure acknowledges that some complaints may be extremely difficult to resolve and can cause anxiety and distress to complainants, and employees. Whilst Inverness Leisure will always aim to try to find a way to resolve matters, there may be circumstances where a complainant persists in pursuing a complaint when the complaints procedure has been fully implemented. Such cases should be referred to the Chief Executive.

In such cases a review of the complainant's case will be carried out to ensure that it does not contain new issues which merit a further response and we will advise them accordingly.

If, after the first 3 stages have been exhausted, the complainant remains dissatisfied they can take their complaint to the Scottish Public Service Ombudsman.

We will record all incidents of unacceptable actions by complainants.

## **9. ISSUES THAT FALL OUTSIDE OF THIS POLICY**

Certain types of complaint are not dealt with by the complaints policy. Complaints by Inverness Leisure employees - unless they are made as a customer, will be dealt with under the company's Human Resources policies and procedures.

The threat or use of physical violence, verbal abuse or harassment towards Inverness Leisure staff is likely to result in the ending of all direct contact with the complainant. The Health and Safety Executives definition of work related violence is: "any incident in which a person is abused, threatened or assaulted in circumstances relating to their work." Incidents will normally be reported to the police. Inverness Leisure's Emergency Action Plan (EAP) and Employee Handbook identify the roles and responsibilities for dealing with the issue of work related violence.

Inverness Leisure will involve the Police in cases where it is believed that 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 Inverness Leisure's premises.

Inverness Leisure staff will end telephone calls if the caller is considered aggressive, abusive or offensive. The employee taking the call has the right to make this decision, tell the caller that the behaviour is unacceptable and end the call if the behaviour does not stop. A record should be made of any such telephone calls and referred to the Customer Service & Events Officer.

Likewise, we do not deal with correspondence that is abusive to staff or contains allegations that lack substantive evidence. When this happens we will tell the complainant 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. Such letters should be referred to the Head of Finance & Administration.

Incidents that relate to child protection issues will be dealt with in accordance with our Child & Vulnerable Adult Protection Policy.

## **10. STAFF TRAINING**

All employees that have a role in delivering this policy will be provided with suitable training so they understand their role and responsibilities. This will include frontline staff that may be approached by customers wishing to complain and staff with a responsibility for investigating complaints.

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 training on the complaints policy and procedure.

Managers will have a responsibility to inform, support and monitor staff to ensure that the policy and procedure is properly implemented and that staff are aware of the process. Staff handling the complaint will have access to information on Data Protection and Freedom of Information legislation and practice and will be aware of the expectations of the public in respect of their information. Where appropriate, training will be provided.

## **11. PUBLICISING THE POLICY**

We will publish this policy along with the Inverness Leisure Mission Statement & Customer Promise and Customer Comment Response Procedure on the company's website. There is a customer comment system in place at reception.

## **12. REVIEW**

This process will be reviewed every two years.

## APPENDIX A

### STAGE 1

Firstly, speak with the staff providing the service you wish to comment or complain about. Most problems can be dealt with quickly by the people closest to the situation.

If you are unhappy with the response or feel unable to approach these staff directly then put your comment or complaint in writing (either by using the on-site customer comment collection system, email or letter) to the Customer Service & Events Officer, Inverness Leisure, Bught Lane, Inverness, Highland, IV3 5SS, who will investigate the matter and normally provide a response within 20 days.

### STAGE 2

If you are unhappy with the response write to the Chief Executive, at the same address, who will look at it and decide if more action is needed. A response will normally be given within 20 days.

### STAGE 3

If you are unhappy with the response write to the Chair of the Board of Trustees, at the same address, who will look at it and decide if more action is needed. A response will normally be given within 20 days.

### STAGE 4

If you are still unhappy you can take your complaint to the Scottish Public Service Ombudsman at:

4 Melville Street  
Edinburgh  
EH3 7NS  
Tel: 0800 377 7330  
Text Number: 0790 0494372  
Fax: 0800 377 7331  
Email: [ask@spsso.org.uk](mailto:ask@spsso.org.uk)  
Web: [www.spsso.org.uk](http://www.spsso.org.uk)  
Freepost: EH461, Edinburgh, EH3 0BR

## CUSTOMER FEEDBACK AND COMPLAINTS POLICY

