

Invest NI Complaints & Feedback Policy

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Version Control

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1.0 **OVERVIEW**

1.1 **Purpose**

The purpose of this document is to outline Invest NI's policy for the receipt, handling, recording and reporting of customer complaints and feedback related to service delivery.

1.2 **Introduction/Background**

Invest NI's current Complaints & Feedback process was introduced in November 2013 and focuses on the administrative aspects of complaints handling, including how to communicate with the complainant and how to log the complaint. It is based on best practice as seen in the operations of similar organisations and the NI Public Services Ombudsman.

The process also covers how to capture feedback, both positive and negative, which provides useful information to help reinforce good behaviours and address any underlying issues that affect service delivery.

It is important to regularly review and improve our Complaints & Feedback procedure, taking into account the views of customers, complainants and staff, in order to maximise the opportunity to learn from those occasions when our level of service is less than the customer can expect.

1.3 **Need for a Complaints & Feedback Handling Process**

Invest NI is continuing to develop an organisational culture where our staff work together as one team with the aim of satisfying the needs of our customers and providing a world class customer experience. To do this we need to recognise that customer feedback, positive or negative, is a way of identifying improvements and allowing us to take action when something goes wrong.

While Invest NI is committed to providing a high quality service to our customers, there may be occasions when problems arise and they do not receive the service they expect. That is why Invest NI encourages customers to provide feedback, so that we can deal with issues fully and as quickly as possible, allowing us to put things right in the most appropriate manner.

The implementation of a clear, robust complaints and feedback process, along with staff who are equipped and confident in dealing with feedback, will benefit Invest NI because:

- Long term relationships with customers are more profitable in terms of time, encouraging larger interventions and developing export capability;
- Employees will feel more motivated and satisfied in their jobs if the level of highly satisfied customers rises;
- Highly satisfied customers are more likely to recommend Invest NI to other people; and
- Highly satisfied customers can be a source of ideas and suggestions for service improvement and product innovation.

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Invest NI's staff are committed to resolving problems for customers as part of their day-to-day activities by taking corrective action to address any shortfall in service delivery. Through the application of this policy, the organisation will generate information about trends and underlying issues that will feed into the Business Improvement Process and drive continuous improvement activity. This will enable the organisation to put in place preventative action to ensure that errors or issues are not repeated.

This policy also notes the need to capture positive feedback and celebrating success in terms of our customer relationships. This is important as it reinforces good performance and helps to set the standard for the whole organisation.

1.4 Scope of this Policy

This policy provides guidance on the handling and recording of customer complaints and feedback. It is not designed to cover resolution of internal disputes between Invest NI teams.

There are a number of examples of customer contact or feedback that are not relevant to this policy, including requests for a service, requests for information, appeals to a tribunal or appeals of business decision (see Invest NI's Appeals Procedure).

In addition, it should be noted that this policy does not cover complaints made about recruitment and selection as there is a separate Complaints Procedure relating to this activity.

It is possible that there will be crossover between the Complaints & Feedback Policy and other policies. For example, issues raised by customers through this policy may constitute an allegation of fraudulent activity or whistleblowing, which are covered by the Anti-Fraud Policy and Whistleblowing Policy respectively. These cases should be managed on a case-by-case basis and advice should be sought from the Complaints Manager.

2.0 COMPLAINTS HANDLING

2.1 What is a Complaint?

Invest NI's customers and stakeholders will provide feedback through a number of routes. While Invest NI empowers and encourages all staff to resolve issues and provide solutions on an informal, 'business as usual' basis for their customers, it is crucial that each member of staff understands when an issue has escalated to the point where it should be treated as a complaint.

Invest NI's approach is guided by the following definition of a complaint:

'an expression of dissatisfaction made to an organisation, *related to its service*, where a response or resolution is expected'

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The key points in the above definition are that the issue is such that the customer could reasonably expect that corrective action will be taken (*resolution*) and that Invest NI's actions will be documented (*response*). This could be due to a number of factors, including the following:

- The potential need for Invest NI to apologise for its actions or performance;
- The seriousness of any allegation relating to Invest NI's performance, including timeliness, conduct of staff or quality of service;
- An accusation of discrimination, or the potential for such an accusation;
- Escalation to a regulatory body (e.g. the Information Commissioner's Office) or public representative (e.g. MLA), or the potential for such an escalation;
- Potential for the matter to result in legal action against Invest NI; and
- The potential for the matter to be published.

Customers can complain by contacting Invest NI's Complaints Manager. In addition, if a customer or stakeholder, or a representative of a customer or stakeholder, contact's Invest NI's Chief Executive to raise an issue that fits the definition above (with the exception of the scenarios listed in the "Scope of this Policy" section) this should be treated as a complaint and handled accordingly.

Any issues raised by customers or stakeholders as part of the day to day interaction with Invest NI staff should be treated as negative feedback, resolved informally and recorded on CRM. However, if the customer specifically states that they wish to make a complaint, advice should be sought from the Complaints Manager on how to proceed.

2.2 Complaints Stages & Escalation

The process for the handling of Formal complaints within Invest NI is set out below. A further option is available to complainants if they feel that they have exhausted Invest NI's complaint process and have not had the matter resolved to their satisfaction.

Stage 1 – Complaint

Complaints received through the Complaints & Feedback mailbox, or through the Chief Executive's office, follow a regulated process. Complaints are assigned by the Complaints & Feedback Manager to an Investigating Officer; this could be the client facing contact or a member of the team responsible for providing the service in question.

Where a complaint is related to the performance or conduct of a specific member of staff, the complaint will usually be escalated to the individual's line manager. It may be appropriate to assign as Investigating Officer someone who is familiar with the area in question but is not directly connected to the team involved.

The Complaints Manager will acknowledge receipt of the complaint within 1 working day and assign the complaint to an Investigating Officer, who is responsible for logging the case on CRM.

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The full response, based on the findings of an impartial and objective investigation, must be provided to the complainant no more than 10 working days after receipt. The response must be approved in advance by the Divisional Director/Head of Division of the Investigating Officer and reviewed by the Complaints Manager. If it is not possible to provide a full response within this timeframe, the Investigating Officer must provide an update and indicate when the customer can expect a full response. The templates provided at the Complaints & Feedback section of the Invest NI intranet must be used for all relevant correspondence with the customer.

Where required, all parties involved in the preparation of a response should have the opportunity to review the final version prior to its issue. In addition, any parties about whom a complaint is specifically made should be made aware of the findings of the investigation prior to the issue of a response.

All activity/correspondence should be copied to the Complaints & Feedback mailbox (complaints.feedback@investni.com) and recorded in CRM to provide a full audit trail.

If the complainant is not satisfied with the outcome, they can request an Internal Review.

Stage 2 – Internal Review

If the complainant is not satisfied with the outcome of their complaint they can request a review of the findings by contacting the Chief Executive's Office. On receipt this will be forwarded to the Complaints Manager, who will acknowledge it (within 1 working day) and assign it to a Divisional Director for review. A full response must be provided within 5 working days.

All activity/correspondence should be copied to the Complaints & Feedback mailbox (complaints.feedback@investni.com) and recorded in CRM to provide a full audit trail.

Stage 3 – Ombudsman (External Review)

Should a customer remain unsatisfied with the resolutions/responses provided by the internal complaints processes they can refer the case to the Northern Ireland Public Services Ombudsman, whose role it is to provide an independent investigation, both of the issue raised and the processes followed in an attempt to resolve the issue internally. Should any member of staff be contacted by the Ombudsman regarding a complaint they should contact the Complaints Manager immediately.

Information about the Northern Ireland Public Services Ombudsman, including contact details, is provided in Invest NI's Complaints Procedure published on its website.

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2.3 Summary of Complaints Stages

Complaint Stage	Ownership	Timelines	Approval required	Format of response
Stage 1 – Complaint	Acknowledged by Complaints Manager and assigned to an Investigating Officer	Acknowledgement within 1 working day, response within 10 working days	Head of Division / Director to approve response, Complaints Manager to review	Templates for acknowledgement and response
Stage 2 – Internal Review	Acknowledged by Complaints Manager and assigned to a Senior Manager (outside Division that handled complaint)	Acknowledgement within 1 working day, response within 5 working days	Executive Director approval for response required	No set format, acknowledgement to indicate timelines, response to indicate escalation route
Stage 3 – Ombudsman	Complaints Manager to liaise with Ombudsman’s office			

2.4 Complaints from Elected Representatives

Where a complaint is made directly to the Chief Executive by an elected representative on behalf of an Invest NI client or member of the public, the CEO’s office will acknowledge their correspondence as usual. However an acknowledgement must still be sent to the original complainant by the investigating officer and the normal complaints process followed from that point. All further correspondence related to the complaint should be copied to the elected representative’s office, as well as the CEO’s office, for information. By the nature of the complainant involving the elected representative in raising the complaint, it can be assumed that the complainant has granted consent for the sharing of information only in relation to the complaint. Invest NI should ensure that it does not disclose any information above and beyond that which is directly pertinent to the complaint.

2.5 Top 10 Tips for Complaints Handling

1. Keep it simple – avoid long forms
2. Use the phone more – don’t automatically send an email or letter
3. *Find out straight away what the person complaining wants you to do about the problem*
4. For less serious complaints, a quick apology is better than a long email
5. Give personal and specific replies – a standard reply will only make things worse
6. Follow the “mother principle” – treat people as you would like your mother to be treated
7. *Don’t pass the buck.* If you need to refer a complaint to someone else, make sure you give the customer full details
8. Be clear what remedies you can offer
9. Let your customer know about improvements made as a result of their complaints

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10. And remember – more complaints can be good news! It shows that your customers trust you to take them seriously.

2.6 Principles of Investigating Complaints

All complaints should be investigated thoroughly and objectively and, where possible, should be investigated and completed within 10 working days. If, during the investigations, it becomes clear that this timescale will not be met, it is essential that the complainant is kept informed (using the appropriate template provided on the intranet for complaints). A scanned version of all signed letters (or a copy of e-mails) should be sent to the Complaints Manager and logged in CRM.

When investigating complaints, there are three main areas that need to be fully addressed in order for a resolution to be achieved. These are:

- Dealing with the substantive issues of the complaint;
- Dealing with the procedural requirements of how decisions in relation to the complaint have been made; and
- Considering how the complainant has been dealt with throughout the original decision making process.

Some questions that can be used as a guide to ensure that a complaint has been properly addressed are:

- Is an apology necessary?
- Has everything been done to reasonably resolve the issue?
- Was policy adhered to?
- Have there been any unacceptable delays?
- Are you prepared to defend Invest NI's actions in each case to the Ombudsman should it become necessary?

Where possible these should be included in the notes for the investigation and signed off to ensure due diligence has been completed.

In addition, all investigations into complaints **must** be conducted on a fair and impartial basis. Where the complaint concerns a decision taken by Invest NI, the original decision-maker should not be a part of the team investigating the complaint. Similarly, where a complaint involves the conduct or performance of a member of staff, the complaint should not be investigated by that member of staff. Where a reasonable person would perceive a conflict of interest to exist regarding an individual, they should not conduct the investigation.

2.7 Response Templates

Response templates are provided to acknowledge and respond to complaints, as well as to indicate a revised timeline to the complainant should it not be possible to provide a response

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within the 10 day timeframe. Although the templates are in letter format, they can be used to communicate by email if that is the appropriate form of communication.

All correspondence relating to a complaint must be copied to the Complaints & Feedback mailbox (complaints.feedback@investni.com) and recorded in CRM to provide a full audit trail.

Response templates can be found in the Complaints & Feedback section of the Invest NI intranet.

2.8 Monitoring of Satisfaction with Complaints Process

To ensure the effectiveness of the Invest NI complaints process, and customer satisfaction with the process, an online survey will be sent to all complainants who have had their complaints upheld. The survey does not ask for details about the outcome of the complaint but instead asks the complainant for their views on how the process was carried out.

The complainant has the opportunity of providing further details and can also indicate whether they wish to be contacted in relation to their feedback.

All survey results are analysed in order to review any opportunities to improve the process.

2.9 Recording Complaints on CRM and Meridio

The information that we gain through the Complaints & Feedback process about the service we provide to our customers is valuable. It is essential that all feedback (positive and negative), complaints and internal reviews are recorded accurately on CRM so that underlying trends can be identified and remedied through continuous improvement activity.

Invest NI reports to its customers and stakeholders on its timeliness in responding to complaints as part of its Standards of Service. The information recorded in CRM needs to be accurate to facilitate this reporting.

It is also essential that a full audit trail is maintained throughout the process of resolving a complaint. For this reason, all correspondence relating to complaints and internal reviews must be copied to the Complaints & Feedback mailbox (complaints.feedback@investni.com) and stored in the appropriate section of the Customer Fileplan.

2.10 Complaints about Delivery Partners

Invest NI uses external delivery organisations (EDOs) to deliver, or assist in the delivery, of a number of its services and programmes. EDOs should ensure they have proportionate processes in place for seeking and management of feedback and complaints from their customers. Any complaints received by Invest NI about the performance of an EDO should, with the agreement of the complainant, be directed to the EDO themselves, who will be required to demonstrate that the necessary action has been taken to investigate the complaint thoroughly.

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3.0 **FEEDBACK**

3.1 **What is Feedback?**

Feedback is, of course, a general term relating to the information that our customers provide to us about the service that we deliver to them. In the context of the Complaints & Feedback Policy, feedback can be defined as either:

- Negative feedback or improvement prompts that are raised by customers as part of their day to day interaction with Invest NI staff; or
- Positive feedback about performance that has exceeded the customer's expectations.

Feedback can be received through a number of sources, including in writing (letter, email), by phone, face-to-face, via social media or through Customer Satisfaction Survey responses.

3.2 **Handling and Responding to Feedback**

Whenever a customer has taken the time to provide feedback of any kind (positive or negative), it is essential to recognise and respond to that feedback as part of our regular engagement with the customer. Invest NI empowers all staff to resolve issues and provide solutions on an informal, 'business as usual' basis. This policy does not seek to change the nature of those interactions or current practices. As a result, there are no set templates for acknowledging or responding to feedback.

3.3 **Capturing Feedback**

It is acknowledged that, in the course of our day-to-day interactions with customers, they will remark upon the service they have received in a variety of ways and in many contexts. It is not feasible to attempt to capture every single remark. There is therefore an element of subjectivity in knowing what to capture or not.

It should however be stressed that the value to Invest NI of capturing as much data as possible about how its customers view the service they receive is immeasurable. This data can be analysed in order to provide useful insight into our strengths and weaknesses, insight that will feed directly into continuous improvement activity.

It is Invest NI's aim to capture as much feedback as possible through CRM and Meridio. This is particularly relevant in the following scenarios:

- The customer has proactively made us aware of a problem (e.g. a conversation or email where the primary or sole subject is the level of service provided);
- The customer has highlighted excellent performance which has exceeded their expectations;

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- The customer has rated Invest NI as less than satisfactory (a rating of 1 or 2) in response to a question about overall satisfaction on a Customer Satisfaction Survey (see below); and
- The customer has indicated that they are 'Highly Satisfied' with the service provided (rating of 5) on a Customer Satisfaction Survey and has provided substantial verbatim comments to the support the rating.

3.4 Customer Survey Satisfaction Returns

The results of each Customer Satisfaction Survey will be reviewed and the responses to be recorded in CRM will be highlighted to the relevant teams.

A rating of 1 or 2 (out of 5) to the question about overall satisfaction should be logged as 'Negative Feedback' and followed up with the customer as appropriate.

A rating of 5, accompanied by substantial verbatim comments that support the assertion that performance exceeded customer expectations, should be logged as positive feedback.

Ownership of the cases will be assigned to the team that has provided the service in question. In all cases the date received should be logged as the date the owner was made aware of the survey response.

3.5 Recording Feedback on CRM and Meridio

It is essential that feedback (positive and negative) is recorded accurately on CRM using the appropriate case types, with any follow up action and correspondence with the customer captured on both CRM and the Customer File Plan in Meridio.

It is not necessary to copy correspondence to the Complaints & Feedback mailbox (complaints.feedback@investni.com). The Complaints Manager will monitor open CRM cases and prompt case owners to complete cases where necessary.

3.6 Celebrating Success

Positive feedback can serve to highlight excellence in customer service, which in turns helps to set the standard for the whole organisation. In order to set this standard as high as possible, only feedback that clearly demonstrates that the customer's expectations have been exceeded (i.e. when performance is above and beyond the norm) should be captured and reported on through this policy.

Other positive feedback and expressions of gratitude from customers should be shared amongst the team involved and used to drive standards locally.

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4.0 REVIEW AND REPORTING

4.1 Process Review

A review of the Complaints & Feedback Policy, taking into accounts the views of customers, complainants and staff, will be carried out annually. Changes to the process outlined in this document will be communicated to all staff.

4.2 Analysis of Trends

The Complaints Manager is responsible for collating and analysing the data captured on CRM to identify trends or themes. This information will feed into the Customer Action Plan to drive an overall programme of improvement.

4.3 Schedule of Reporting

A full report, based on the analysis carried out, will be presented to the Executive Leadership Team quarterly and summarised in Core Brief. An annual update will be provided to the Invest NI Audit & Risk Committee. The annual summary will be published on the Complaints & Feedback section of the intranet and will also be made available externally on the Invest NI website.

5.0 FURTHER GUIDANCE

5.1 Complaints & Feedback Champions

Each division within Invest NI has nominated a member (or members) of staff to be the Complaints & Feedback Champion(s) for that division. These Champions will be responsible for:

- Advising team members on day-to-day use of the process
- Seeking guidance from the Complaints Manager
- Meeting with other Customer Service Champions throughout the year to discuss complaints and feedback trends and process issues, and
- Presenting 'lessons learned' and good news stories at Team/Divisional Meetings (if required)

As such the Champion should be the first point of contact for any queries related to the Complaints & Feedback Policy but they should not be responsible for the handling and investigation of all complaints received.

Regular meetings between the Champions and the Complaints Manager will be held throughout the year (at least quarterly) to share experiences of staff using the process and identify possible improvements in feedback handling procedures. This will also provide the opportunity to share good practice and learning, as well as crystallise emerging trends in complaints received.

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5.2 Contact Details

Should you require any guidance or support on dealing with customer feedback or comments you should, in the first instance, speak to the Complaints & Feedback Champion within your division who can advise you of the process.

Alternatively you can contact the Complaints Manager:

Colin Morelli
Invest NI
Bedford Square
Bedford Street
BT2 7ES

e-mail: colin.morelli@investni.com or
complaints.feedback@investni.com

phone: 028 9069 8164

More information on complaints handling can be found in guidance provided by the Northern Ireland Public Services Ombudsman:

<https://nipso.org.uk/nipso/>

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