

NOR-SEQ-PCD-7 : Customer Complaints Procedure

Applicable to: Norse Group of companies

Client: N/A – Internal Document

Document Classification: This document is classified as PROTECT in accordance with the Information Sensitivity Policy.

This procedure forms part of Norse’s Integrated Management System

Document approval

Version	Date	Owner	Position
5	31/01/22	Roger Smith	Acting Director of SHEQ

Document history

Version	Date	Owner	Position	Comments
3	24/11/20	Roger Smith	Head of SHEQ	First issue. V1 and v2 not used.
3.01	05/10/21	Steve Smith	Audit and Compliance Manager	Added 1.4 – availability of procedure to interested parties
4	05/10/21	Roger Smith	Acting Director of SHEQ	Approved
4.01	31/01/22	Steve Smith	Technical Author	New reference to CQC, references to 1 st /2 nd /3 rd response letters amended in process map and 5.2.4, additional bullets at 5.2.2 covering abuse or suspected abuse, references to specific arbiters removed at 5.3.3, ref to Data Protection Policy added at section 7.

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1 Introduction

- 1.1 Norse is committed to providing high quality services which meet the expectations of our customers and the requirements of relevant external regulators, e.g. Health and Safety Executive (HSE), Environment Agency (EA) and Care Quality Commission (CQC). In the unfortunate event a customer feels aggrieved at the service they have received, customers may submit a complaint in accordance with this procedure. A valid customer is one to whom the company owes a duty of care. The definition of a complaint is “when a customer feels aggrieved or does not feel that they have received a satisfactory response or resolution to an action/inaction by Norse”.
- 1.2 All complaints received shall be dealt with on an individual basis. It is recognised that some complaints may be vexatious or sensitive in nature.
- 1.3 Complaints may originate from different sources depending on whether material products are involved. They may be received via the internet, letter, email, phone or in person.
- 1.4 This complaints procedure shall be made available to any interested parties upon request.

2 Scope

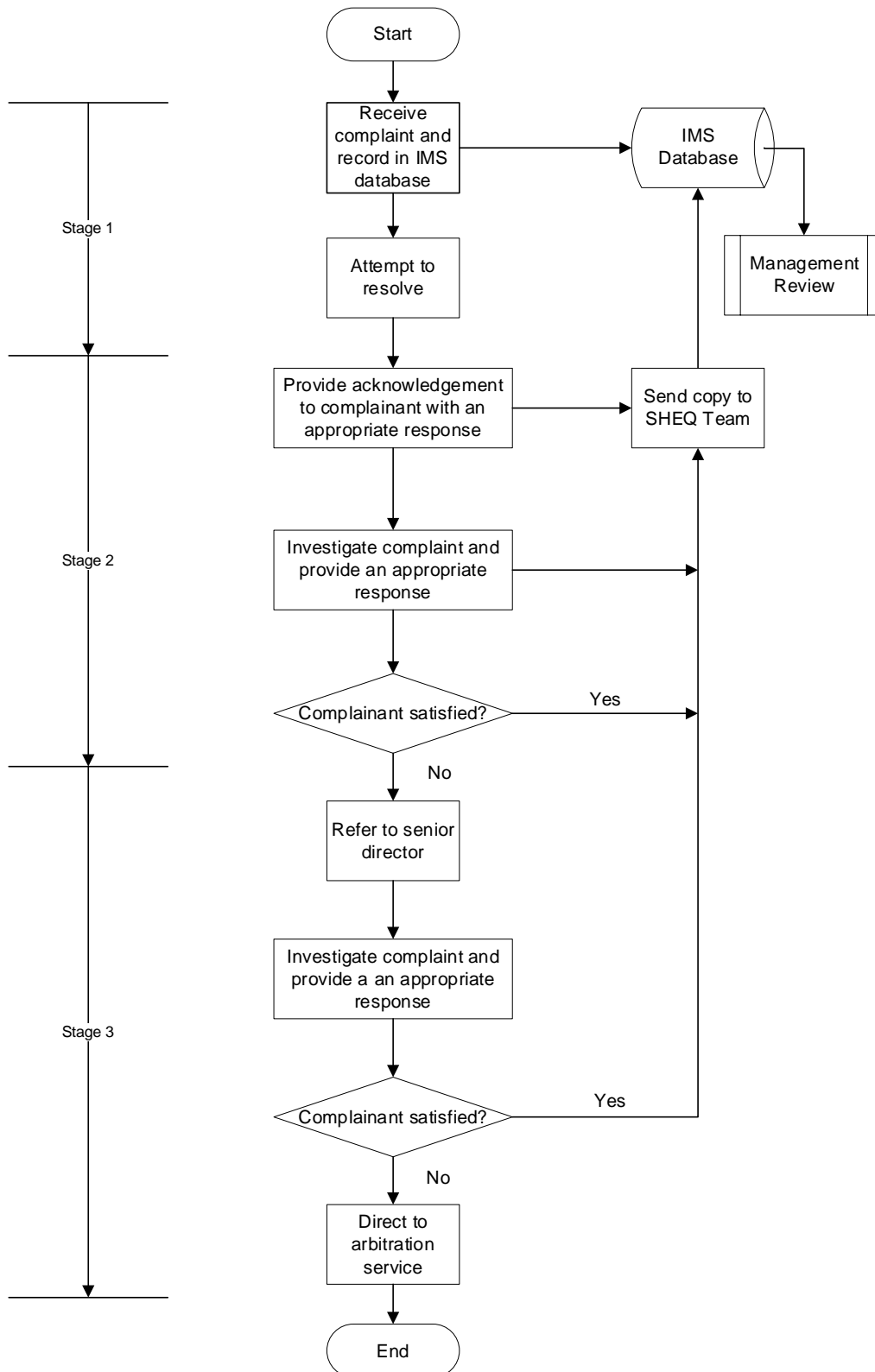
- 2.1 This procedure specifies three possible stages of complaint lifecycles:
- Stage 1 – Informal
 - Stage 2 – Formal
 - Stage 3 – Senior Management
- 2.2 Norse shall make every effort to resolve customer complaints quickly and satisfactorily. In the event that this is not possible or where the complainant remains dissatisfied, this procedure includes a redress mechanism using 3rd parties.
- 2.3 Where JV partners mandate a complaints handling system of their own, Norse shall record complaints independently for the purposes of monitoring, statistics and information sharing with other Norse teams, if appropriate.

3 Responsibilities

- 3.1 The receiver of a complaint (individual, service or team) shall record it in the IMS database and update the SHEQ Team regarding further actions they take. The receiver is referred to as the originator in this procedure.
- 3.2 The originator’s manager shall determine whether a complaint should be dealt with at Stage 2 immediately.
- 3.3 The SHEQ Team shall ensure that escalation to Stage 2 complaints is done, where required.
- 3.4 The manager assigned to a Stage 2 complaint is responsible for ensuring a first response letter is submitted to the complainant and for undertaking an investigation into the complaint’s nature and causes. The manager shall submit a response letter applicable to stage 2 offering a resolution. Updates shall be provided to the SHEQ Team.
- 3.5 The appropriate Senior Manager is responsible for reviewing and proposing a resolution to complaints that have reached Stage 3. If the complainant expresses dissatisfaction with the responses offered, the Senior Manager shall direct the complainant to relevant arbitration services.

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4 Process Map



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5 Procedure

5.1 Stage 1 (Informal)

5.1.1 Complaints shall be considered at operational level. It is possible that the majority of complaints can be resolved at Stage 1. See also NOR-SEQ-PCD-5 Customer Care, for soft skills to be deployed for Stage 1 complaints. It remains the relevant manager's discretion whether to escalate a complaint straight to Stage 2 if the situation requires it.

Examples of Stage 1 include but are not limited to:

- A minor issue that is easily rectified
- An issue that is not sensitive or serious
- Where a customer wishes to make a note of an issue but does not wish to escalate it to a formal complaint
- A request for a replacement item or items to be removed/collected
- Customer calling to notify of late arrival of staff
- Customer dissatisfied with a standard issue product, e.g. taps or sanitary ware

5.1.2 All complaints received, action and correspondence shall be tracked in the IMS Access database. However, only those which progress to Stage 2 shall be reported to the Senior Executive Team.

5.1.3 If complaints are received directly by senior management they shall be assessed for sensitivity or seriousness (see 5.2.2) and be passed to the appropriate team to investigate. In some circumstances, an independent investigator (i.e. from another division or external investigator) may be appointed to conduct the investigation.

5.2 Stage 2 (Formal)

5.2.1 Stage 2 complaints are those that are serious or sensitive in nature, or involve a matter which has not been resolved to the satisfaction of the complainant at Stage 1.

5.2.2 Stage 2 includes but is not limited to:

1. Examples of a **serious** nature:
 - A complaint from a customer or a member of the public about a staff member's standard of conduct or behaviour
 - A complaint about late or non-delivery of a service causing the disruption or cancellation of a planned event or project
 - A complaint concerning a serious Health and Safety allegation
 - Alleged breach of other legislation/regulations, for example GDPR
 - A complaint about a threat/risk to the safety of a member of the public
 - A complaint about the impact of Norse or its constituent companies' operations on the environment
 - Repeated Stage 1 failures which have escalated to Stage 2
2. Examples of a **sensitive** nature:
 - The complaint concerns an allegation of theft or dishonesty
 - The complaint concerns inappropriate behaviour of a sexual or racist nature
 - The complaint concerns a particular manager

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- If the complaint involves alleged abuse or a suspicion that abuse has occurred within Norse Care, the matter will be referred immediately to the nominated safeguarding lead who will then notify the CQC (Care Quality Commission)
- If the complaint involves alleged abuse or suspicion that abuse has occurred anywhere else within Norse Group then the matter will be referred immediately to the HR Director.

5.2.3 To assist the recipient of a complaint, a *Formal Complaint Response Form* is available to request and record information. The completed form shall be submitted to the SHEQ Team.

5.2.4 To provide an audit trail, the 1st responder must be identified and shall respond **within 5 working days**. For clarity there is a **1st Response Letter** template available and this or similar format should be used in any written communication.

5.2.5 A Stage 2 or a Stage 3 complaint arriving directly at Head Office shall be acknowledged using a central response letter, there is also a template available for this.

5.2.6 A Senior Manager or Director (as appropriate) within the department/team, who has not previously been involved in the complaint or originating incident may investigate the complaint or a complaints case manager may carry out the investigation. The formal response shall be submitted to the complainant.

5.2.7 Where it has not been possible to resolve a complaint at Stage 2 or where a complainant is not satisfied with the solution offered by Norse, the complaint shall be escalated to Stage 3.

5.2.8 All formal complaints should be investigated and concluded **within 15 working days**. If an extension is required then the reasons for this extension shall be communicated via the complaints handling system.

5.3 Stage 3 Complaints (Senior Director Level)

5.3.1 Stage 3 complaints shall be reviewed by Senior Directors. These are usually ongoing complaints which could not be resolved to the complainant's satisfaction at Stage 2 and which merit further review or investigation.

5.3.2 Senior Management's decision will be the final response from Norse, direct to the complainant.

5.3.3 Where Senior Management decides that no further action is necessary and the complainant remains dissatisfied, they may be directed to external arbiters depending on the nature of the complaint:

5.4 Unreasonable, vexatious or persistent complaints

5.4.1 Norse will treat every complaint with consideration based on severity and impact, responding to the complainant to seek an agreeable and fair resolution.

5.4.2 Complaints that are considered to be unreasonable, vexatious or persistent, will if required, be treated as nuisance and passed to a regulatory authority.

6 Monitoring, measurement and reporting

6.1 Data capture from the complaints process can be used in the Customer Care procedure. In particular, complaints may affect the results of customer surveys and identify the need for appropriate account management.

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- 6.2 A statistical analysis, and an assessment of customer complaints shall be included in management reviews.
- 6.3 It is always positive to receive compliments about the service provided by Norse, we encourage all of our customers to compliment as they feel appropriate. This could be verbally, in writing, online or via our websites.
- 6.4 All compliments shall be recorded on our database and the information provided shall be reported and evaluated by the IMS team. This data enables Norse to monitor the quality of its services and to recognise staff for their achievements. This information can also be provided to prospective clients.
- 6.5 All complaints recording and storage shall be in line with our Data Protection Policy. Complaints forms shall not be shared with external parties, other than the original complainant, without prior consent from the Data Protection Officer (DPO).

7 Associated documentation

NOR-SEQ-PCD-5 Customer Care

First Response Letter Template

Complaints Response Letter (stages 2 and 3 only).

Norse Formal Complaint Prompt Form

Norse Group Data Protection Policy

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