

## Common Room North Complaints Policy and Procedure

Last updated: June 2025

We are committed to reviewing and updating our policies every 2 years.

Review due: June 2027

### Policy Statement

Common Room North Ltd welcomes complaints and feedback from all individuals engaging on our work projects, partner organisations, and other stakeholders. We view complaints as valuable opportunities to learn, adapt, improve, and provide better services. This policy ensures complaints are dealt with properly, taken seriously, and systematically used to identify trends, rectify issues, and enhance our processes and service delivery. The policy focuses on understanding the facts, addressing concerns, and finding effective resolutions, rather than apportioning blame. It aims to restore trust and improve future interactions.

Common Room believes that failure to listen to or acknowledge complaints will lead to an aggravation of problems, individual dissatisfaction and possible litigation. We support the concept that most complaints, if dealt with early, openly and honestly, can be sorted out at a local level between just the complainant and Common Room. If, after our internal complaints process is exhausted, the complainant remains dissatisfied with the outcome, they will be informed of their right to refer their complaint to the relevant external body (e.g., PALS, CQC, Local Government and Social Care Ombudsman, or other relevant professional body). Common Room North Ltd will seek legal advice as necessary to ensure compliance and proper handling of complex issues.

### Aim

Our aim is to foster confidence that all complaints and concerns are listened to, thoroughly investigated, and acted upon promptly, fairly, and transparently, leading to effective resolution.

- Complainants should be aware of how to complain, and be provided with easy-to-use opportunities for them to register their complaints
- A named Complaints Officer will be responsible for the administration of this procedure. In the first instance, please direct complaints to Liz Neill, Director, via [liz.neill@commonroom.uk.com](mailto:liz.neill@commonroom.uk.com). Where a complaint directly involves Liz Neill, please contact Jeni Roussounis, Associate Consultant, via [jeni@commonroom.uk.com](mailto:jeni@commonroom.uk.com).
- Any written complaint will be acknowledged within two working days, providing details of our complaints procedure.
- We aim to provide a full written response and resolution to all complaints within 28 working days (approximately 4 weeks) of acknowledgement. If due to the complexity of the complaint, we anticipate exceeding this timeframe, we will inform the

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complainant of the delay and provide a revised timeframe, along with regular updates. Our absolute maximum for resolution will be 8 weeks.

- All complaints are responded to in writing
- Complaints are dealt with promptly, fairly and sensitively with due regard to the upset and worry that they can cause to anybody concerned

### **Complaints Procedure**

#### Oral Complaints

- All oral complaints, no matter how seemingly unimportant, should be taken seriously. There is nothing to be gained by staff adopting a defensive or aggressive attitude.
- Staff who receive an oral complaint should seek to solve the problem immediately if possible.
- If staff cannot solve the problem immediately they should offer to get the manager to deal with the problem.
- All contact with the complainant should be polite, courteous and sympathetic.
- At all times staff should remain calm and respectful.
- Staff should listen empathetically, remaining calm and respectful. While not admitting liability, they should acknowledge the complainant's concerns and express regret for any distress or negative experience caused. After talking the problem through, each manager or the member of staff dealing with the complaint should suggest a course of action to resolve the complaint. If this course of action is acceptable then the member of staff should clarify the agreement with the complainant and agree a way in which the results of the complaint will be communicated to the complainant (i.e. through another meeting or by email).
- If the suggested plan of action is not acceptable to the complainant then the member of staff or manager should ask the complainant to put their complaint in writing to the company and give them a copy of the complaints procedure and form for completion.
- In both cases details of the complaints should be recorded on a complaints form and handed to the manager.

#### Written Complaints

- When a complaint is received in writing it should be passed on to the named manager who should record it and send an acknowledgment letter/email within two working days.
- Information detailing the procedure should be forwarded to the complainant.
- If the complaint raises potentially serious matters, advice should be sought from a legal advisor to the company. If legal action is taken at this stage any

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investigation by the establishment under the complaints procedure should cease immediately.

- If the complainant is not prepared to have the investigation conducted by Common Room they should be advised to contact the Commission for Social Care Inspectorate/PALS/NHS CCG (whichever relevant) and be given the contact details. Common Room will continue to conduct an internal investigation, as most external bodies will require the internal process to be exhausted first.
- Immediately on receipt of the complaint Common Room should launch an investigation and within 28 days should be in a position to provide a full explanation to the complainant, either in writing or by arranging a meeting with the individuals concerned.
- If the issues are too complex to complete the investigation within 28 days of acknowledgement. If due to the complexity of the complaint, we anticipate exceeding this timeframe, we will inform the complainant of the delay and provide a revised timeframe, along with regular updates. Our absolute maximum for resolution will be 8 weeks.
- If a meeting is arranged the complainant should be advised that they may, if they wish, bring a friend or relative or a representative such as an advocate.
- At the meeting a detailed explanation of the results of the investigation should be given and also an apology if it is deemed appropriate (apologising for what has happened need not be an admission of liability).
- Such a meeting gives Common Room the opportunity to show the complainant that the matter has been taken seriously and has been thoroughly investigated.
- After the meeting, or if the complainant does not want a meeting, a written account of the investigation and final response should be sent to the complainant. This should include details of how to approach a relevant ombudsman or external body if the complainant is not satisfied with the outcome.
- The outcomes of the investigation and the meeting should be recorded on appropriate documentation and any shortcomings in procedures should be identified and acted upon.

### **Learning & Improvement**

All complaints, their outcomes, and any identified shortcomings will be regularly reviewed by senior management to identify trends, implement corrective actions, and drive continuous service improvement. Anonymised learnings may be shared across teams.

### **Confidentiality and Data Protection**

All personal data will be handled in line with GDPR. Please see Common Room North Ltd Data Protection Policy and Personal Data Flowchart.

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### **Record Keeping**

Records will be stored for between six months and six years and then destroyed. The length of record retention will be judged on a case-by-case basis.

### **Statement on Vexatious, Unreasonable, or Persistent Complaints**

Common Room North Ltd is committed to dealing with all complaints fairly, consistently, and respectfully. We recognise that making a complaint can be a stressful experience, and we will always strive to resolve issues efficiently and empathetically.

However, a very small number of complaints may be made or pursued in a way that is unreasonable, vexatious, or persistently disproportionate to the issue at hand. Such behaviour can hinder our ability to effectively investigate the complaint, cause significant disruption to our work, and negatively impact the wellbeing of our staff.

What constitutes vexatious, unreasonable, or persistent behaviour may include, but is not limited to:

- Excessive or obsessive contact: Making frequent, lengthy, and/or numerous contacts (e.g., calls, emails, letters) about a complaint, beyond what is reasonable or necessary for its resolution, especially after being advised of appropriate contact methods or frequency.
- Refusal to cooperate or accept outcomes: Refusing to accept that an issue is not within the scope of our policy, continually introducing trivial or irrelevant new information, or persistently refusing to accept a decision once a thorough investigation has been completed and all internal appeal avenues exhausted, without presenting new and substantive evidence.
- Abusive, aggressive, or threatening behaviour: Using offensive, abusive, threatening, or discriminatory language, or engaging in any form of intimidation towards our staff or partners.
- "Scattergun" approach: Pursuing the same complaint simultaneously with multiple internal staff or external bodies (e.g., commissioners, regulators, legal advisors) without allowing our internal process to conclude.
- Falsified information: Knowingly providing false information or submitting falsified documents.
- Demands for unrealistic outcomes: Insisting on outcomes that are unrealistic, unachievable, or beyond our power to provide.

Our approach to managing such complaints:

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If a complainant's behaviour falls into these categories, we will take steps to manage the situation, ensuring our staff are protected and resources are used effectively, while still seeking to resolve legitimate concerns. Before taking any action, we will:

1. Review the complaint: Ensure we have fully and properly investigated the complaint according to our policy and that all reasonable efforts have been made to communicate with the complainant.
2. Consider underlying factors: Acknowledge that certain circumstances (e.g., mental health conditions, disabilities, or distress) may affect a person's behaviour and will make reasonable adjustments as required by the Equality Act 2010.
3. Communicate clearly: We will normally issue a written warning to the complainant, explaining why their behaviour is considered unreasonable and outlining the impact it is having. We will also explain what action we may take if the behaviour continues.

Possible actions we may take include:

- Restricting contact to a single nominated staff member.
- Limiting contact to a specific method (e.g., written correspondence only) or specific days/times.
- Placing time limits on telephone conversations or meetings.
- Refusing to register or process further correspondence on the same matter if it introduces no new, substantive information.
- In extreme cases, and where there is no further action we can reasonably take, we may decide to cease all communication with the complainant regarding that specific issue.
- In cases of threats or violence, we will immediately inform the police and take appropriate legal action.

Any decision to apply restrictions will be made by a senior manager, will be proportionate to the behaviour, and will be communicated to the complainant in writing, explaining the reasons and duration of the restrictions. We will regularly review such restrictions to ensure they remain appropriate.

We are committed to treating all complainants with fairness and respect, and this policy is in place to ensure that our complaints process remains effective, and our staff can carry out their duties without undue disruption or harassment.