



Derry City & Strabane  
District Council  
Comhairle  
Chathair Dhoire &  
Cheantar an tSratha Báin  
Derry Cittie & Stràbane  
Destrict Council

# Feedback and Complaints Policy

## 1. Preamble

### 1.1 Purpose

- 1.1.1 Derry City and Strabane District Council's Feedback and Complaints Policy aims to:
- (a) Clarify how the public can make a comment, compliment or complaint
  - (b) Define the standards the public can expect when they make a complaint
  - (c) Recognize the importance of complaints and providing feedback about Council services and performance, and
  - (d) Set out how the Council will monitor feedback and complaints and use that information to improve services and identify training needs.
- 1.1.2 The policy sets out how the Council will decide how feedback, including complaints, will be treated.
- 1.1.3 This policy is for the information of staff and elected members as well as those wishing to provide feedback.

### 1.2 Background

- 1.2.1 Derry City and Strabane District Council aims to provide excellent services to all our stakeholders including customers and citizens. Dealing effectively with stakeholder feedback (including complaints) is an essential part of the Council's business and key to improving our services.

## **2. Scope**

### **2.1 Complaints and Feedback**

- 2.1.1 This policy covers all types of feedback from stakeholders, including complaints. However, certain types of complaint are not intended to be dealt with by this policy and are more appropriately dealt with through other channels, these include:
- (a) Complaints by Council employees or potential employees, unless they are made as service users. Matters relating to employment, for example, pay, disciplinary or grievance matters, and recruitment and selection, are more appropriately dealt with under the Council's human resources policies and procedures
  - (b) Complaints covered by statutory procedures, for example, related to the section 75 duties
  - (c) Complaints from contractors or potential contractors relating to the award of contracts
  - (d) Complaints where the customer has started legal proceedings or has previously taken the matter to court or tribunal.
- 2.1.2 In addition, we will not investigate complaints relating to issues that are greater than 3 months old.

## **3. Definitions**

### **3.1 Compliment**

- 3.1.1 A compliment is defined as a customer statement of positive recognition or praise for a service or individual.

### **3.2 Comment**

- 3.2.1 A comment is a personal opinion or belief, feedback or remark expressed by a customer or citizen. Comments can include suggestions for changes in services and/or practices.

### **3.3 Complaint**

- 3.3.1 The following description should be used as a framework for defining what a complaint is, but should also be operated flexibly to deal with exceptions to the definition.
- 3.3.2 A complaint is an expression of dissatisfaction by one or more members of the public about:
- (a) the Council's action or lack of action; or
  - (b) the standard of a service provided, regardless of whether the action was taken

or the service provided by the Council itself, or a person or body acting on behalf of the Council.

3.3.3 This definition could include one or more of the following:

- (a) Failure to provide a service to a customer
- (b) Delay in providing a service to a customer
- (c) Poor quality service to a customer or a mistake. There is no definition of poor quality in this policy; this is based on the perception of the customer.
- (d) Provision of an inappropriate service to the customer. There is no definition of inappropriate service in this policy, this is based on the perception of the customer, as above
- (e) Removal or withdrawal of a service from a customer
- (f) Charging an inappropriate cost for a service
- (g) Upset to a customer caused by an employee's behaviour
- (h) Unreasonable disadvantage to the customer caused by Council policy
- (i) Unfair discrimination against a customer.

### **3.4 Complainant**

3.4.1 A complainant is defined as someone who has made a complaint either verbally, in writing or via a third party.

3.4.2 Third party complaints will only be accepted where the complainant is incapable of making a complaint, such as a minor or a person suffering from an illness or other incapacity.

### **3.5 Unacceptable complainant behaviour**

3.5.1 Unacceptable behaviour includes behaviour which is abusive, offensive or threatening and may include:

- (a) Using abusive or foul language on the telephone
- (b) Using abusive or foul language face-to-face
- (c) Sending multiple e-mails
- (d) Leaving multiple voicemails.
- (e) Harassing or otherwise seeking to intimidate staff dealing with a complaint.

### **3.6 Unreasonably persistent and/or vexatious complainants**

- 3.6.1 The Council defines unreasonably persistent and /or vexatious complainants as those complainants who, because of the frequency or nature of their contacts with the Council, hinder the Council's consideration of their or other people's complaints. The description 'unreasonably persistent' and 'vexatious' may apply separately or jointly to a particular complainant.
- 3.6.2 Examples include the way or frequency that complainant raises their complaint with staff, or how complainants respond when informed of the Council's decision about the complaint.
- 3.6.3 In general terms, persistent refers to the frequency or nature of contacts with the Council which hinders the consideration of an individual's or other people complaints. A vexatious complainant in this context is someone who is not seeking to resolve a dispute between themselves and the Council but rather is seeking to cause unnecessary aggravation or annoyance to the Council.
- 3.6.4 Features of an unreasonably persistent and/ or vexatious complainant include the following (the list is not exhaustive, nor does one single feature on its own necessarily imply that the person will be considered as being in this category).

An unreasonably persistent and/or vexatious complainant may:

- (a) Have insufficient or no grounds for the complaint and be making the complaint only to annoy (or for reasons that he or she does not admit or make obvious)
- (b) Refuse to specify the grounds of a complaint despite offers of assistance
- (c) Refuse to cooperate with the complaints investigation process, while still wishing the complaint to be resolved
- (d) Refuse to accept that issues are not within the remit of the complaints policy and procedure despite having been provided with information about the scope of the policy and procedure
- (e) Refuse to accept where issues are not the remit of the Council to investigate, change or influence
- (f) Insist on the complaint being dealt with in ways which are incompatible with the complaints procedure or with good practice (e.g. insisting that there must not be any written record of the complaint)
- (g) Make what appears to be groundless complaints about the staff dealing with the complaints, and seek to have them dismissed or replaced
- (h) Make an unreasonable number of contacts with the Council, by any means, in relation to a specific complaint or complaints
- (i) Make persistent and unreasonable demands or expectations of staff and/or the complaints process after the unreasonableness has been explained to the

complainant (e.g. a complainant who insists on immediate responses to numerous, frequent and/or complex letters, telephone calls, e-mails, etc.)

- (j) Raise subsidiary or new issues whilst the complaint is being addressed that were not part of the complaint at the start of the complaint process
- (k) Introduce trivial or relevant information whilst the complaint is being investigated and expect this to be taken into account and commented on
- (l) Change the substance or basis of the complaint without reasonable justification whilst the complaint is being addressed
- (m) Deny statements made at an earlier stage in the complaint process
- (n) Electronically record meetings and conversations without the prior knowledge and consent of the other person involved
- (o) Adopt an aggressively scattergun approach, for instance, pursuing a complaint/complaints not only with the Council, but at the same time with elected members, other councils, the auditor, solicitors, etc.
- (p) Refuse to accept the outcome of the complaint process after its conclusion, repeatedly arguing the point, complaining about the outcome, and/or denying that an adequate response has been given
- (q) Make the same complaint repeatedly, perhaps with minor differences, after the complaints procedure has been conducted, and insist the minor differences make these 'new' complaint(s) which should be put through the full complaints procedure
- (r) Persistently approach the Council through different routes about the same issue
- (s) Persist in seeking an outcome which the Council has explained is unrealistic for legal or policy (or other valid) reasons
- (t) Refuse to accept documented evidence is factual
- (u) Complain about or challenge an issue based on an historic and irreversible decision or incident
- (v) Combine some or all of the above features.

### **3.7 Stakeholders**

- 3.7.1 Stakeholders include local residents and businesses, visitors, suppliers of services, community groups and any other group or individual who is affected by our services.

## **4. Policy Statement**

### **4.1 How can a customer give feedback?**

4.1.1. The customer can do this by:

- Telephone
- E-mail

- In writing
- In person
- In an alternative format that is appropriate for the customer

## **4.2 Feedback and Complaints**

- 4.2.1 Derry City and Strabane District Council welcomes all feedback, including complaints.
- 4.2.2 The Council values feedback about its services and recognises the right of all its stakeholders to complain, compliment or make a comment about any Council activity or service. Stakeholders include local residents and businesses, visitors, suppliers of services, community groups and any other group or individual who is affected by our services. The Council is committed to ensuring that it uses stakeholder feedback to help improve services and to focus on the needs of all customers.
- 4.2.3 The Council is committed to dealing with all complaints equitably, comprehensively and in a timely manner and to providing high quality services to those who make them. As part of delivering its services, the Council would not normally limit the contact complainants have with its offices/staff.
- 4.2.4 All complaints should be made as close to the time that the complainant feeling aggrieved as possible. Delays in making complaints may jeopardise the Council's ability to deal with the complaint in a full and complete manner.

## **4.3 Unacceptable Behaviour by Complainants**

- 4.3.1 Derry City and Strabane District Council does not expect its staff to tolerate behaviour by complainants which is unacceptable, for example, which is abusive, offensive or threatening and will take action to protect staff from that behaviour.

## **4.4 Unreasonably Persistent and/or Vexatious Complainants**

- 4.4.1 In the small number of incidences where complainants who, because of the frequency of their contact, hinder consideration of their, or other people's complaints, the Council will deem such complainants to be 'unreasonably

persistent and/or vexatious' and will, exceptionally, take action to limit their contact with offices/staff.

## **5. General Principles**

### **5.1 Complainant Rights**

5.1.1 Complainants have the right:

- (a) To be treated with courtesy and respect at all times
- (b) To have a friend or other representative help them with a complaint (a letter of authority will be required)
- (c) To confidentiality (if an investigation cannot proceed without complainant being identified, the complainant will be given the option whether or not to continue)
- (d) To be kept informed of the progress of a complaint
- (e) To receive an apology if a complaint is upheld
- (f) To be informed of any changes to Council policy or procedures arising from a complaint.

#### **Equality and Accessibility**

5.1.2 Derry City and Strabane District Council is committed to equal opportunities and our aim is to make our Feedback and Complaints Policy easy to use and accessible to all our stakeholders. It will be widely publicised, available in a variety of formats and customer leaflets and feedback forms will be available in all Council public points of access.

5.1.3 Derry City and Strabane District Council are committed to ensuring equality of opportunity in accessing information we therefore provide information in alternative formats on request, where reasonably practicable. Where the exact request cannot be met we will ensure a reasonable alternative is provided.

5.1.4 All necessary efforts will be made to ensure that stakeholders with particular needs, such as physical or sensory impairments, learning disabilities and stakeholders who are less familiar with English have full access to the policy and procedures. Forms can be provided in large print, Braille, audio and translated into community languages as required. In some specific circumstances, the Council will offer face-to-face support or advocacy to those who may need help in making a complaint or in response. Derry City and Strabane District Council encourages people to seek support from friends and

other representatives, and the Council will assist people in finding such support where possible.

- 5.1.5 Derry City and Strabane District Council will monitor the use of this policy for equality purposes to ensure it is being accessed by all sections of the community.

### **Confidentiality**

- 5.1.6 The identity of the person making a complaint will not be made public unless the law requires Council to do so. However, officers dealing with the complaints will be advised of the name of the complainant. Officers will have access to the complaints database to see the complainant has made previous complaints, or the particular complaint has already been investigated.

- 5.1.7 All complaints received will be dealt with in accordance with the requirements of the Data Protection Act 1998.

### **Contractors/partnerships**

- 5.1.8 A number of services are provided by contractors/organisations working on behalf of the Council. As contracts/service level agreements come up for renewal, the Council will work to develop a situation whereby contractors/organisations use the same standards as Council for dealing with the complaints they receive. When complaints are received by the Council, agreements will be developed which specify an identified point of contact from the contractor and timescales for providing the required information. Contracts will also require contractors to provide Council with information on complaints they receive to enable the Council to monitor and assess trends and patterns. The same principles will apply where the Council provides services in partnership with other public bodies/ organisations.

- 5.1.9 It will always be made clear to whom and member of the public may complain.

- 5.1.10 An analysis of the complaints made about services provided by contractors/partners will be included in an annual report.

- 5.1.11 In all third-party arrangements, where services are provided on behalf of the Council, complainants will be able to refer their concerns to the Council.



## **Anonymous Complaints**

- 5.1.12 Derry City and Strabane District Council does not encourage stakeholders to make anonymous complaints, however we accept that on occasion, individuals may choose to make them. Whilst we cannot acknowledge or reply to any unnamed individual, the Council, as a professional organisation, will investigate each complaint and resolve any relevant service improvement issues identified as quickly as time and resources allow.
- 5.1.13 Anonymous complaints are unlikely to be dealt with effectively under this policy as the Council needs to correspond with and in some cases meet with the complainant in order to address their concerns. When taking details of a complaint, staff should always encourage customers to provide their identity in order for their complaint to be effectively processed.
- 5.1.14 Anonymous complaints will be forwarded to the relevant service manager. Where relevant, these will be responded to the Council's website.
- 5.1.15 Any anonymous complaint or comment that relates to children and/or vulnerable people will be investigated and acted upon immediately.

## **Special Circumstances**

- 5.1.16 This policy does not preclude a referral of information on matters such as financial impropriety or criminal activity to appropriate bodies and / or for specialist advice.

## **6. Operating the Policy**

### **6.1 Recording feedback**

- 6.1.1 The Council will record all feedback; both informal and formal feedback.
- 6.1.2 The system for recording feedback is as follows:
- (a) Telephones
    - (i) Anyone receiving feedback (including informal and formal complaints), regardless of whether it relates to their service area or not, should record it on Council's feedback form<sup>1</sup>. The person receiving the feedback/complaint should take details from complainant, including the telephone number, and

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<sup>1</sup> Feedback form may be in hard copy or electronic form.

inform them that someone will contact them, and pass the details on to an appropriate officer;

- (ii) Where possible the person receiving a complaint/feedback, should resolve it satisfactorily there and then. The officer should record that the complaint/feedback has been resolved/forwarded/etc.
  - (iii) If the person receiving feedback/complaint is unable to resolve the issue, then they should inform the stakeholder that the matter has been recorded and will be dealt, as soon as possible, and in any event in accordance with the standards set out in this policy.
  - (iv) The key contact telephone number for feedback/complaints is the Council's main number (028 71 253253). There is, however, a dedicated telephone line (028 71 374107) to handle service requests, complaints, etc. in regard to the refuse collection service.
- (b) Complaints in person
- (i) Where feedback/ a complaint is received in person, the person dealing with the matter should follow the above procedure. Where the issue cannot be dealt with immediately, this should be noted and the person informed that the matter will be dealt, as soon as possible, and in any event in accordance with the standards set out in this policy.
- (c) E-mails
- (i) There is a dedicated email address:  
customerfeedback@derryandstrabane.comto handle feedback, service requests, complaints, etc. in regard to Council services.
  - (ii) As with telephone calls, officers receiving feedback/a complaint via e-mail should log the issue on the feedback form. If they are able to resolve the matter satisfactorily, they should record that the feedback/complaint has been resolved/ forwarded etc.
  - (iii) If they are unable to resolve an issue satisfactorily, they should forward an e-mail with the subject matter to the Information Management Support team.
  - (iv) As with telephone calls, where feedback/complaint has been dealt with, the feedback form should be updated and filed with any relevant documentation.
- (d) Letters and Complaints Forms
- (i) Any feedback received by letter or in the form of completed feedback form, will be dealt with as set out above. The original documentation should be scanned and electronically stored with the feedback form.

## 6.2 Feedback Response Standards

### Compliment

- 6.2.1 Details of a compliment will be logged and receipt of the customer compliment acknowledged within five working days, if appropriate. The customer will be thanked for taking an interest in our services and taking the time to let us know we are providing a good service.
- 6.2.2 Excellent service will be acknowledged with an individual employee/ team, by the Head of Service.

### 6.2.3 Comment

- 6.2.4 Details of the comment will be logged and receipt acknowledged within five working days.
- 6.2.5 The service manager will consider the comment and send a response to the customer within 15 working days.
- 6.2.6 Where the customer has made a suggestion, it will either be explained to the customer how their suggestion will be implemented or why Council was unable to do so. The customer will be thanked for their feedback and for helping Council to improve its services.

### Complaint

- 6.2.7 Each stage is investigated by a different member of staff in order to ensure impartiality. All complaints, including verbal complaints, that the customer has requested will be treated formally, must be acknowledged in writing, or by e-mail if submitted in that form, within five working days.

Stage	Timescale for action	Responsible Officer
Stage 1 – Informal Complaint- Response from Service manager	Acknowledgement within 5 working days	Service Manager
	Response within 15 working days	Service Manager
Stage 2 – Formal Complaint	Acknowledgement within 5 working days, Including contact details of nominated investigation officer.	Head of Service
	Response within 15 working days	Head of Service

<b>Stage 3 – Review by Chief Executive</b>	<b>Outcome of review within 15 working days of request.</b>	<b>Chief Executive or nominated Strategic Director</b>
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- 6.2.8 In the event that the above response time scales cannot be achieved, the responsible officer should write to the complainant explaining why there is a delay and giving a new date for when a response should be received.
- 6.2.9 If comments/compliments/complaints are received in an alternative format the above response time scales may need to be adjusted to facilitate translation/interpretation of contribution received and preparation of response.
- 6.2.10 Complainants will be advised that if they are not satisfied with the way in which their complaint has been handled, at any time, they can complain to the NI Public Services Ombudsman.
- 6.2.11 Investigation reports will be kept for at least a year after the complaints procedure has been exhausted, subject to any further legislative requirements and the Councils' Retention and Disposal Policy.

### **6.3 Roles and Responsibilities**

#### **6.3.1 Council Staff**

- 6.3.2 All Council staff should encourage members of the public and service users and other stakeholders to provide feedback on Council services and activities. All complaints should be received respectfully and dealt with in accordance with the Council's procedure.

#### **6.3.3 Service Managers**

- 6.3.4 Service managers will be the first point of contact, in most cases, for a complainant. The service manager should aim to sort out any mistakes, misunderstandings, service figures, except quickly, fairly and politely.

6.3.5 Service managers will be responsible for dealing with comments, compliments and stage one complaints in accordance with the response standards set out in this policy.

6.3.6 Service managers must ensure that full and accurate records of all feedback received are captured and held on the Council's feedback database.

### **Heads of Service**

6.3.7 Heads of Service will be responsible for dealing with any formal complaints received relating to their area of responsibility and identifying an investigating officer(s) to conduct a formal investigation.

6.3.8 The Head of Service must ensure that no-one involved in investigating or making decisions in regard to complaint, has a public or private interest in the outcome of the investigation of a complaint.

6.3.9 The relevant Head of Service will be responsible for reviewing the investigation report and compiling a full written response in relation to the complaint. The Head of Service must forward a copy of their response to the Information Management Support Team for sending to the complainant.

6.3.10 Heads of Service will have responsibility for ensuring full compliance with this policy within in their respective areas.

### **Investigating Officers**

6.3.11 Investigating officers will be responsible for carrying out an impartial and comprehensive investigation regarding any formal complaint(s) and for preparing an investigation report and recommendations for consideration by the relevant Head of Service.

6.3.12 Investigating officers must declare any potential conflict of interest.

### **6.3.13 Chief Executive or Nominated Director**

6.3.14 The Chief Executive has overall responsibility for the implementation of this policy.

6.3.15 In the event that a complainant is still unhappy following an investigation of their complaint and requests a review, the Chief Executive will be responsible

for undertaking the review and will meet with the relevant Head of Service and/or appropriate officers, as necessary. The Chief Executive will inform the complainant of the outcome of the internal investigation/review.

- 6.3.16 The Chief Executive may nominate a Strategic Director who has not been involved to undertake the review process.

#### **Information Management Support Team**

- 6.3.17 The Information Management Support Team will be responsible for the logging and administration of all stage 1 – Written Complaints and Stage 2 and Stage 3 Complaints.

#### **Reporting and Monitoring**

- 6.3.18 Regular reports will be provided to the Senior Management Team and follow up action taken if required.

### **6.4 Redress**

- 6.4.1 Where a complaint investigation identifies things have gone wrong an appropriate remedy will be determined. The general principle in determining a remedy is that, as far as possible, the complainant should be put in the position he/she would have been in had things not gone wrong.
- 6.4.2 Some complaints may be resolved by providing the service desired by the customer. In other cases, consideration will be given to whether there is some practical action that would provide all or part of a suitable remedy. For example:
- (a) An apology (guidance on making an apology has been prepared by the Assembly Ombudsman and Northern Ireland Commissioner for Complaints and should be taken into consideration)
  - (b) An explanation of what went wrong
  - (c) A change of procedures to prevent a recurrence of the incident
  - (d) A review of customer information (leaflets, etc.).
- 6.4.3 Subject to circumstances, the Council may give consideration to different forms of dispute resolution, for example, mediation.
- 6.4.4 There may also be some circumstances where the customer has sustained a loss and the Council may consider recompense. The level of the recompense or in some situations, an ex-gratia payment for 'time and trouble', will be determined by the relevant Strategic Director and will be subject to the

approval of the Town Clerk and Chief of Executive and the Council's Policy and Resources Committee.

- 6.4.5 Where complaint involves any potential for an insurance claim against the Council as a result of loss, damage, injury or suffering, the insurance section should be consulted immediately.

## **7. Legal & Policy Framework**

### **7.1 Linkage to Corporate Plan**

- 7.1.1 Derry City and Strabane District Council's Corporate Plan 2015 - 2019, sets out Council's commitment to deliver Improved service delivery and value for money. Fundamental to this commitment is the provision of quality services and high levels of customer satisfaction.
- 7.1.2 This policy, along with its associated documents, provides a framework within which customer feedback is captured and used to improve services.

## **8. Impact Assessment**

### **8.1 Screening and Equality Impact Assessment**

- 8.1.1 This draft policy has been screened out for equality impact assessment. A copy of the screening questionnaire is attached at Appendix A.

### **8.2 Impact on staff and financial resources**

- 8.2.1 It is acknowledged that there may be a period of adjustment, whilst services become familiar with the system for dealing with customer feedback and correspondence.
- 8.2.2 It is not envisaged that there will be any significant ongoing implementation issues in regard to staff and financial resources. In the short term, however, resources will be required to make staff aware of the new policy and in reviewing existing processes. It is considered that these requirements can be met within existing resources.

### **8.3 Sustainable development**

- 8.3.1 In so far as this policy promotes engagement of citizens, there is a positive contribution towards the Sustainable Development Duty.

### **8.4 Other impacts**

- 8.4.1 The adoption of a formal policy will facilitate a more robust and standardised approach to dealing with feedback across the organization.

## **9. Implementation**

### **9.1 Responsibility**

- 9.1.1 Overall responsibility for the implementation of this policy lies with the Chief Executive.

### **9.2 Support and Advice**

- 9.2.1 For this policy to be successful, all staff will have to have confidence in the process and understand their responsibilities. Training on dealing with customer feedback will be provided alongside training/awareness raising of customer service standards.
- 9.2.2 Training will also be provided to all relevant staff in relation to the use of the feedback database.
- 9.2.3 New employees will be provided with information on this policy as part of their induction process.
- 9.2.4 Supporting guidance in relation to the operation of this policy will be provided.

### **9.3 Guidelines and Forms**

- 9.3.1 The Council's feedback form (hardcopy and electronic versions) , Customer Service and Charter, leaflet on how to make a Comment, Compliment or



Complaint and policies on staff guidance on dealing with complaints are all relevant in the implementation of this policy.

#### **9.4 Communication Strategy**

- 9.4.1 Information on how to make a comment, compliment or complaint will be available in all our public offices and customer reception areas.
- 9.4.2 This policy will be available on request from the (Name of Officer to be Confirmed) and will also be accessible through the council's website: [www.derrycityandstrabanedistrict .com](http://www.derrycityandstrabanedistrict.com) and intranet facility.
- 9.4.3 Responsibility for the communication of this policy to staff lies with service managers.

#### **9.5 Health and safety**

- 9.5.1 The Council recognises that dealing with the public can cause anxiety, particularly where there is a risk of aggression, verbal abuse and violence such charges should be identified through the risk assessment process and suitable control measures implemented.

#### **9.6 Risk Management**

- 9.6.1 Failure to comply effectively with this policy may lead to lost opportunities to improve council services and reducing levels of customer satisfaction.

### **10. Monitoring, review and evaluation**

#### **10.1 Monitoring and assessing**

- 10.1.1 By recording feedback including complaints, Council will be in a better position to analyse trends and respond accordingly.
- 10.1.2 Quarterly reports will be considered by Management Team and the Policy and Resources Committee. Such reports will include key information relating to feedback s such as the number of comments, compliments and complaints received performance against the acknowledgement and response standards, service improvements made as a result of complaints and equality monitoring information.

10.1.3 In addition, Council's annual report will include an assessment of issues such as the number of complaints received, the timeliness of responses, and any issues that may need addressing.

## **10.2 Evaluation**

10.2.1 A sample of complainants will be contacted after complaint has been dealt with to complete a satisfaction form. The aim of this form is to provide information help the Council determine:

- (a) Whether the complaint system was accessible and easy to use
- (b) Levels of satisfaction with the way the complaint was handled and the remedy offered.

## **10.3 Review**

10.3.1 This policy will subject to review no later than 2 years after initial approval and then every 3 years thereafter.