

Complaints signposting in the public sector

Report of a scoping study



About Consumer Focus Scotland

Consumer Focus Scotland is the independent consumer champion for Scotland. We are rooted in over 30 years of work promoting the interests of consumers, particularly those who experience disadvantage in society.

Part of Consumer Focus, our structure reflects the devolved nature of the UK. Consumer Focus Scotland works on issues that affect consumers in Scotland, while at the same time feeding into and drawing on work done at a GB, UK and European level.

We work to secure a fair deal for consumers in different aspects of their lives by promoting fairer markets, greater value for money, improved customer service and more responsive public services. We represent consumers of all kinds: tenants, householders, patients, parents, energy users, solicitors' clients, postal service users or shoppers.

We aim to influence change and shape policy to reflect the needs of consumers. We do this in an informed way based on the evidence we gather through research and our unique knowledge of consumer issues.

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This summary was prepared by Jennifer Wallace and is based heavily on the full scoping report prepared by Craigforth. This full report is available on request. The conclusions and recommendations are from Consumer Focus Scotland.

The project team at Consumer Focus Scotland included Jennifer Wallace, Elizabeth Macdonald and Sarah O'Neill.

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1 Introduction

1.1 Background

In July 2008, the Fit For Purpose Complaints System Action Group, which had been set up following the Crerar Review, provided its report to Scottish Ministers on proposals for simplifying complaints processes for public services. This report included a proposal that:

A signposting service, with a single point of contact, should be established to provide guidance and general advice to consumers on complaining, and this should be based around an existing service such as Consumer Direct^{1, 2}.

Signposting³ is essentially the process of one organisation giving a member of the public details of another organisation that will be able to help them. The original proposal went slightly further than a basic signposting service, envisioning additional guidance and advice for consumers. The anticipated benefits set out in the original proposal by the Action Group included simplifying the complex framework from the perspective of members of the public. It was also hoped that it would promote shared values and best practice among providers and complaints bodies, and provide an overview of levels of complaints connected with Scottish public services.

¹ Scottish Government (2009) Fit for Purpose Complaints System Action Group – Report to Ministers
<http://bit.ly/kmxegR>

² Please note, since the original proposal the UK Government has announced a rationalisation of the consumer landscape, with Consumer Direct to be provided by Citizens Advice

³ The study adopts Advice UK's understanding of signposting – as set out in the 2005 paper *Key steps to effective signposting and referral* – that signposting takes place when an organisation has not undertaken significant work on the specific query (as opposed to referral when it is likely that the organisation will have started to work with the client on the query but for some reason cannot, or no longer thinks it is appropriate to, continue to do so)

Since the Action Group's report, a number of developments have been taken forward to improve the public sector complaints system. The Public Services Reform (Scotland) Act 2010 gave the Scottish Public Services Ombudsman (SPSO) the authority to lead the development of simplified and standardised complaints handling procedures (CHPs) across the public sector. Following consultation, a Statement of Complaints Handling Principles was developed by the SPSO. These Principles were approved by the Parliament and published in January 2011⁴.

The SPSO has established an internal unit, the Complaints Standards Authority (CSA), which will provide further support in improving complaints handling procedures. The CSA will work in partnership with individual public sector areas to oversee the process of developing model CHPs for each sector in line with the framework of the Principles and the guidance. Together these developments should simplify the complaints procedures in public services.

The Public Services Reform (Scotland) Act 2010 also included changes to the scrutiny landscape to reduce the number of scrutiny bodies, particularly in relation to health (with the creation of Health Improvement Scotland) and social care (with the creation of Social Care and Social Work Improvement Scotland or SCSWIS).

⁴ www.valuingcomplaints.org.uk

There are other changes taking place, which are also relevant. The Patient Rights (Scotland) Bill includes provision for setting up a Scotland-wide patient advice and support service under a single national contract. This service is expected to provide advice and support for patients who have experienced a difficulty, to explain the options available and to advise them of other sources of help and assistance.

In spite of all these changes, potential complications are likely to remain for consumers who have experienced problems with public services, for example when they have received a 'package' of services from different organisations and/or different sectors and are not clear exactly where any problems may lie. However, the proposals for a single signposting service have not yet been taken forward. In March 2010 Consumer Focus Scotland, with funding from the Scottish Government, commissioned Craigforth to undertake a scoping study which further explored the issues, the opportunities and the barriers to such a service.

1.2 Purpose of, and approach to, the scoping study

The overall aim of the scoping study was to explore the feasibility of introducing a signposting service for people who want to complain about public services, and set out the pros and cons of alternative options for providing such a service.

The specific objectives for the study were as follows:

- To explore the likely consumer demand
- To explore stakeholder interest in having a signposting service
- To identify options for locating a signposting service
- To explore the cost implications of the options⁵
- To explore the support for telephone and internet based signposting and the feasibility of alternative ways of making contact
- To make recommendations on whether to pursue the signposting proposal and, if so, how best this should be taken forward

This scoping study drew on a range of evidence, including:

- **A review of evidence** – the published evidence from Scotland, the rest of the UK and from Canada, Australia and New Zealand on signposting services was reviewed: this identified very few examples of national signposting services and only one specialising in public sector complaints, which was being proposed in Wales. Information about the possible Signposting Service for Wales was considered.
- **Analysis of consumer survey** – in order to inform the study, Consumer Focus Scotland commissioned TNS-BRMB to carry out an omnibus survey to explore attitudes towards making a complaint about a public service, and awareness of sources of information about making such a complaint. The survey of 1,019 adults in Scotland was carried out in March 2010.

⁵ Please note, costs for each potential delivery option were not established but stakeholder views on the financial acceptability of different options were included in the analysis

- **Interviews with key stakeholders** – interviewees were drawn from the Action Group, those who deliver complaints handling services within Scottish public services, regulatory bodies and organisations in contact with consumers who may be ‘struggling’ with complaints systems within public services. Views were sought on the likely demand for a signposting service, the scope of such a service and the levels of resources and skills that would be required to deliver their preferred option.
- **Web survey of public sector complaints handlers** – a web-based survey was undertaken, with invitations to participate issued through the SPSO. The survey explored organisations’ experience of how members of the public manage, or not, to make contact with the right service if they wish to make a complaint. 63 organisations submitted a response, including 16 local authorities, 5 higher education institutions and 3 health-related organisations.

Craigforth identified seven options, varying in scope and complexity, for making improvements to signposting. These were informed by directly relevant examples, such as the proposals for a signposting service in Wales, and approaches from different sectors, which could be adapted to the specific context of public sector complaints. These options were then discussed at a meeting with key stakeholders. The following organisations were represented at this meeting:

- COSLA
- Consumer Focus Scotland
- NHS Complaints Personnel Association Scotland
- Scottish Customer Service Forum
- Scottish Government
- Scottish Public Services Ombudsman

2 Exploring the need and appetite for a signposting service

This section explores whether the primary research carried out for this study and relevant literature identifies a need and appetite for a signposting service. It explores the perspectives and experiences of both members of the public and service providers.

2.1 Nature of the problem

Previous research and our interviews with key stakeholders identified a number of interrelated issues that suggest there is a continued need for a signposting service: The landscape for public sector complaints in Scotland is complex and difficult to navigate

- Increasing use of shared services and third or private sector providers increases the complexity of complaints processes
- Consumers do not currently know where to take complaints, leading many not to take further action. This is particularly the case for vulnerable and disadvantaged consumers

Despite recent changes, the landscape for public sector complaints in Scotland remains complex. As an example, Audit Scotland's *Route Map: Your guide to complaining about public services in Scotland* lists eight agencies that deal with complaints relating to the Scottish Parliament alone⁶. Despite some rationalisation of the complaints landscape these complexities remain.

A number of research participants cited the boundary between health and social care services as being the most common 'grey area' where consumers experienced difficulties in knowing where to take their complaints. The example frequently given was making the necessary preparations for discharge from hospital and in particular the timely arrangement of any care or support services required. In this case, the member of the public may not be clear whether they are dissatisfied with the service they have received from the NHS, their local authority or both. These findings are very much in line with those of the 2009 report on complaints and feedback from patients and carers about NHS services in Scotland which found that:

As the boundaries between some aspects of social care and health are becoming more blurred, the relationship between the NHS Complaints Procedure and other, separate complaints processes in social care add potential complication for a complainant as to which process to follow⁷.

⁶ Audit Scotland (2004) *Route map: Your guide to complaining about public services in Scotland* <http://bit.ly/jFckLv>

⁷ Making it better: Complaints and feedback from patients and carers about NHS services in Scotland (2009) Craigforth for the Scottish Health Council. Available at: <http://bit.ly/ljxnBO> (PDF 636KB)

Where more than one service has been involved it is not always clear which organisation(s) is responsible for the service and people may simply not know which service they wish to or should complain about. A possible example could be a member of the public being taken into hospital by ambulance – if the service was poor, the problem could be with the ambulance service, the hospital or both. During interviews, even those experienced in offering support and advice to members of the public acknowledged that, based on the consumer's experience alone, it can be difficult, if not impossible, to reach a conclusion about where any complaint should appropriately be directed.

Interviews with key stakeholders identified 'complicated' complaints, involving different services and sectors, as an increasing risk with the changes to public services. Increasing use of shared services and commissioning of private and third sector organisations may increase the complexity of the complaints landscape. For example, some research participants were aware of cases in which members of the public had been dissatisfied with homecare or similar services that were commissioned and paid for by their local authority, but provided by a private company. Again, some research participants suggested that both professionals and consumers could be confused about where any complaint should be lodged.

Given the complexity of the landscape, consumers are likely to require knowledge and skill firstly to find their way into the system and then to navigate their way around it. However, evidence suggests that consumers do not possess enough knowledge of the landscape of public services to identify the correct complaint route. A number of research projects have found that not knowing how to make a complaint is a common reason given for not taking further action⁸. For example, local authority representatives informed us that they regularly receive calls regarding water stoppages or leaks, which are within the remit of Scottish Water. It is therefore perhaps unsurprising that the evidence from various studies shows that most of those who want to complain will take no action.

Among those who have experienced some sort of problem with a public service, minority and 'difficult to reach' groups are less likely to complain. However, the primary research undertaken for this study found no evidence to suggest that any particular groups were experiencing greater problems than others; rather, key stakeholders felt that it was the complexity of the possible complaint that many identified as the critical factor.

⁸ Scottish Consumer Council (2007) *Literature review on the consumer approach to scrutiny on behalf of independent review of regulation, audit, inspection and complaint handling of public services in Scotland* available through <http://consumerfocus.org.uk/g/4p7>

2.2 Scale of the problem

In order to identify the number of people who could benefit from a signposting service, the consumer survey first established how many members of the public wanted or needed to make a complaint about public services. It then looked at the number of people who went on to make complaints and the numbers who reported that they knew where to go for advice on making a complaint. From these figures we have estimated the unmet demand for advice on making a complaint.

The survey asked about whether people knew where to go for advice, rather than referred to signposting specifically, as it was felt that this would be more relevant to members of the public. In addition, it is clear from the original proposal by the Action Group that the signposting service was expected to provide guidance and advice as well as basic signposting.

As Table 1 shows, around one in five people (21 per cent) said they had needed or wanted to make a complaint about a public service in the last year. This translates into 899,149 people who needed or wanted to make a complaint about a public service in the last year. In total, 13 per cent of respondents had made a complaint about a public service in the last 12 months.

Overall, 19 per cent of the adult population reported that they did not know where to go for advice on how to make a complaint, equating to over 800,000 people in Scotland.

Table 1: Number of people who wanted or needed to make a complaint and number who did not know where to get advice on making a complaint

	Percentage (out of all respondents)	Number of adults⁹
Wanted or needed to make a complaint about a public service in the last 12 months	21%	899,149
Went on to make a complaint about a public service in the last 12 months	13%	548,480
Did not know where to go to get advice on the subject	19%	813,516

⁹ Calculations based on the General Register Office for Scotland mid-2009 population estimates
<http://bit.ly/kpdAeg>

Table 2 reflects these figures as a percentage of those who needed or wanted to make a complaint about public services. Around three in five (61 per cent) of those who needed or wanted to make a complaint about a Scottish public service said they had done so. This means that over 39 per cent of those who reported that they needed or wanted to make a complaint in the last 12 months did not go on to do so. This equates to 350,669 complaints that were not reported to public services.

Interestingly, those who went on to make a complaint were less likely to report that they did not know where to go for advice (4 per cent of those who went on to make a complaint compared to 11 per cent of those who did not go on to make a complaint). This suggests that knowing where to go for advice increases the likelihood of going on to make a complaint; however, it is unclear whether this is a causal relationship or a result of other factors such as gender or level of education.

Table 2 also shows that 11 per cent of those who wanted or needed to make a complaint did not know where to get advice on the subject. These figures suggest that approximately 2 per cent of the adult population, or 100,000 people a year, could potentially benefit from a signposting service, though of course not all would be expected to use such a service.

Table 2: Percentage and number of adults made a complaint about a public service in the last 12 months and who did not know where to go for advice

	Percentage of adults (out of those who wanted or needed to make a complaint)	Number of adults (Percentage out of total adult population)¹⁰
Went on to make a complaint about a public service in the last 12 months	61%	548,480 (13%)
Did not know where to go to get advice on the subject	11%	98,906 (2%)

¹⁰ Calculations based on the General Register Office for Scotland mid-2009 population estimates
<http://bit.ly/kpdAeg>

The survey also asked for information on where people would go for advice about how to make a complaint about a public service. This open question provoked a range of responses, with 18 potential advice providers identified. The most popular sources were:

- going directly to the service they wanted to complain about (34 per cent)
- Citizens Advice Bureau (26 per cent)
- local councillor (13 per cent)
- internet (8 per cent)
- MP/MSP (5 per cent)
- Scottish Public Services Ombudsman (2 per cent)

The reasons why people contact particular organisations when seeking information about how to complain do not appear to be straightforward and may in fact be specific to the individual. The ‘first port of call’ may be as much about consumer preference as factors such as ease of access or high profile. Hence, these behaviours may not be affected by changes to the ‘complaints landscape’.

2.3 Current system responses

Many organisations within the public and voluntary sector are already providing signposting and referral services, as well as offering advice and support to those wishing to make a complaint. This was particularly the case for some local authorities and organisations such as Citizens Advice Bureaux. In addition, a number of public sector and voluntary sector organisations consulted as part of this research reported that they currently receive complaints-related enquiries that are not connected with their own service.

The web survey of current complaints handlers carried out for this project found that overall 40 per cent of respondents said they signposted either often or sometimes, with 60 per cent reporting that they did so either rarely or never (see Table 3). Local authorities were the most likely to report that they either often or sometimes signposted members of the public who required information on where to take their complaint outwith their organisation (63 per cent reporting they signposted often or sometimes, compared to 38 per cent who said they did so rarely or never). As Table 3 shows, registered social landlords, higher education institutions and health bodies were more likely to report that they either rarely or never signposted members of the public.

Table 3: Current level of signposting by public services

	Often/Sometimes (% out of organisational type)	Rarely/Never (% out of organisational type) ¹⁰	Total
Local authority	10 (63%)	6 (38%)	16
Registered social landlord	8 (30%)	19 (70%)	27
Higher education institution	1 (33%)	2 (67%)	3
Health body	1 (20%)	4 (80%)	5
Other	5 (42%)	7 (58%)	12
Total	25 (40%)	38 (60%)	63

Please note percentages may add up to more than 100 per cent due to rounding

Representatives of some organisations reported making considerable efforts to assist people who contacted them with regard to a complaint about another organisation, even if this work was well outwith the remit of their organisation. For some this translated into a considerable workload for what were often relatively small staff teams.

2.4 Views on a signposting service

The evidence suggests that there is a consumer demand for a signposting service, with nine in 10 people reporting that they would find it helpful to have a single place or point of contact providing advice or support to make a complaint¹¹.

Public sector complaints handlers support the proposals for a signposting service for members of the public, with around half of those surveyed for this research believing that a signposting service for members of the public was a good idea (one in five disagreed with this and just under one in three were not sure)¹². Given the current level of signposting uncovered, it is perhaps unsurprising that many of the organisations that currently fulfil an informal signposting role were keen to see a formal signposting service established.

¹¹ Survey of members of the public, carried out by TNS-BRMB in April 2010

¹² Craigforth web survey of public sector complaints handlers, 2010

Moreover, both the survey of public sector complaints handlers and the stakeholder interviews confirmed that some organisations would welcome a reduction in the number of people contacting them for information about how to make a complaint.

However, many also commented on the need to offer advice and support rather than simply 'pointing someone in the right direction'. In cases where organisations were going to considerable lengths to assist members of the public, this was often motivated by a strong public service ethos. It was also noted that some of those that made contact appeared to be vulnerable and in need of support. Some interviewees also reported that many of their existing clients prefer to approach services or staff that are already known to them. A number of those contributing to the research stressed that significant and specialist advice and support would be required if more vulnerable individuals were to be enabled to make a complaint.



3 Potential approaches to developing a signposting service

This section of the report explores potential approaches to developing a signposting service for complaints about public services. It begins with an exploration of consumer preferences and goes on to discuss the options appraisal for potential approaches to developing a signposting service.

3.1 Consumer preferences on location and method of providing help and support to make a complaint

The survey of members of the public asked for views on which organisations people would consider approaching if they needed practical help or support to actually make a complaint about a public service¹³. Overall, respondents were most likely to report approaching a Citizens Advice Bureau (76 per cent), with 12 per cent reporting that they would contact the Scottish Public Services Ombudsman and 10 per cent reporting that they would contact Consumer Direct. 11 per cent would not approach any of the three organisations suggested and 7 per cent reported that they did not know who they would approach.

The survey also asked for preferences on the method of communication with a single point of contact that could give advice on making a complaint about public services. The survey found a preference for face-to-face advice provision (57 per cent) and telephone base advice provision (47 per cent)¹⁴. There was less support for using new technology such as email (22 per cent) and websites (16 per cent) and this support was highest among those aged 25–34 years old (for example, 39 per cent of those aged 25–34 would use email to access advice, while only 14 per cent of those aged 55–64 would and only 4 per cent of those aged 65 and over).

The preferences of members of the public informed the subsequent discussion on options for establishing a signposting service.

¹³ This question differed from the one referred to in section 2.2. In this case respondents were asked about practical help and support rather than general advice, and only three options were given: Citizens Advice Bureau, the Scottish Public Services Ombudsman and Consumer Direct

¹⁴ Please note, respondents could choose more than one method of communication

3.2 Process of options appraisal

Having reviewed the evidence base and held initial discussions with some key stakeholders, a number of options for possible future action were developed. These options were discussed with the Stakeholder Advisory Group at a meeting in November 2010.

The group rejected only one option in its entirety. Option 7 was that there should be local or community complaints champions. It was felt that this could have significant risks in relation to quality and could prove very expensive to implement. The remaining six options, along with a summary assessment of their likely advantages and disadvantages, are set out in Tables 4 and 5.

While the options are presented as separate and potentially 'stand-alone', in reality, all or some could form part of a more comprehensive response to the problem. It was also important to note that some options could be more or less effective depending on whether other options are also being taken forward.

The discussion of the options can be separated into two separate sections:

- Options to reduce the need for signposting (options 1–3)
- Signposting service (options 4–6).



3.3 Options 1–3: Reducing the need for signposting

Table 4: Options for reducing the need for signposting

Option	Description	Advantages	Disadvantages
Option 1: Service level improvements to information about how to complain	Improvements in information provided by public services to consumers about making a complaint and hence to reduce the need for signposting.	Extension of existing role of SPSO through the complaints standards authority (CSA) Limited direct costs	Limited impact as does not address the information needs of consumers SPSO role will simplify procedures but complexities will not be eliminated Will not assist consumers who approach the wrong service in the first instance Will not provide additional guidance and advice to consumers
Option 2: Professional directory (with a provider focus)	To assist public sector complaints handlers to identify, and potentially make contact with, their counterparts in other public sector services to inform their signposting of consumers.	Would improve information and understanding of who to signpost to among complaints handlers and those who support people making complaints Could be delivered online and include named contact details to improve transfer of cases Could largely be delivered using existing SPSO and public services resources	Limited impact as does not address the information needs of consumers It would require initial resources to identify existing complaints processes and contacts and subsequently maintain this information Will not provide additional guidance and advice to consumers
Option 3: Managed network(s) of complaints handlers	To support handlers of public sector complaints by developing a network to deal with complicated complaints and disseminating information and identifying good practice.	Improve existing arrangements for signposting between organisations and agencies Improve resolution of individual cases, particularly more complex cases and more vulnerable individuals Could involve consumers in setting direction and priorities It offers an additional component to the professional directory (option 2)	Limited impact as does not address the information needs of consumers It would require clear specification of the role and purpose of the network, and to ensure that it is sufficiently structured and avoids duplicating or overlapping with other systems and procedures

The SPSO confirmed that the work outlined in **option 1** is already going ahead as part of their Complaints Standards Authority role. The model complaints handling procedures will provide a simplified procedure which should aid consumers in understanding how to make a complaint. There was strong support for this during the discussion but also a general feeling that option 1 is necessary but not sufficient in terms of signposting. While it is beneficial to consumers, they will still need to know which service to go to in the first instance.

Stakeholders felt that both **options 2 and 3** had benefits in improving signposting by existing public services and therefore reducing the need for a signposting service. These options both focus on improving communication between complaints handlers, either through the creation of a directory of named contacts (option 2) or through a managed network of complaints handlers (option 3). While these options are provider-focused rather than consumer-focused, stakeholders felt that the aim of improving current practice is that consumers should receive consistent signposting information regardless of where they go for this advice.

While the focus on discussion on options 2 and 3 was on public sector complaints handlers, stakeholders felt there would be merit in including intermediaries such as advice organisations and advocacy groups.

Key issues raised in terms of the professional directory for advisers (option 2) were that this information would have to be kept up to date and public services would have to take responsibility for informing the 'owner' of the directory of changes. In relation to option 3, it was felt that any network would have to be carefully managed to ensure that it met its objectives and did not create duplication with other existing networks.

Overall, the options to reduce the need for a signposting service would improve consumers' experience of contacting public services for advice on who to take a complaint to. However, the options would not necessarily provide consistent advice and guidance for consumers or help where consumers did not know where to go in the first instance.

3.4 Options 4–6: Signposting service

Table 5: Options for establishing a signposting service

Option	Description	Advantages	Disadvantages
<p>Option 4: National, online information, publicly available</p>	<p>A comprehensive web- information resource for consumers wanting to know how and where to make a complaint about a public service.</p>	<ul style="list-style-type: none"> • Would meet the information needs of consumers on where and how to complain • Would signpost to sources of independent information and advice, for support, advocacy and alternative forms of redress or resolution • Would ensure consistent general information and advice is provided • Could provide information on trends in complaints about public services • Could be hosted on Scottish Government site and organisations encouraged to link to it 	<ul style="list-style-type: none"> • Resources required to set up and maintain, involving the collection of information about current arrangements • Risk that information is not updated, particularly if no organisation is given ownership of the site • The format (online) will not be suitable for some consumers • Would not provide personalised guidance and advice to consumers, though could signpost to this
<p>Option 5: Single, national signposting service</p>	<p>To provide online and telephone-based information and generic advice to members of the public wanting to know how and where to make a complaint. It would be delivered by a national team.</p>	<ul style="list-style-type: none"> • Provides consumers with two methods for contacting the service (online and telephone) • Would meet the information needs of consumers on where and how to complain • Would ensure consistent information and advice is provided • Would reduce need for informal signposting currently provided by public services • Could provide information on trends in complaints about public services <p>Would use existing organisations and expertise rather than require new team</p>	<ul style="list-style-type: none"> • Resources required to set up and maintain, involving the collection of information about current arrangements • Staff required to provide telephone-based or email advice • Some stakeholders query acceptability of likely cost • May require the establishment of a new team to provide the service

Option	Description	Advantages	Disadvantages
Option 6: National signposting service, locally delivered	To provide online, telephone and face-to face information and both general and personalised advice to members of the public wanting to know how and where to make a complaint. It would be delivered by existing local services.	<ul style="list-style-type: none"> • Provides consumers with a range of methods for contacting the service • Would meet the information needs of consumers on where and how to complain • Would reduce need for informal signposting currently provided by public services • Could provide personalised guidance and advice to consumers • Could provide information on trends in complaints about public services 	<ul style="list-style-type: none"> • Resources required to set up and maintain, involving the collection of information about current arrangements • Significant resource implications. • Staff required to provide face-to-face, telephone-based and email advice • Some stakeholders query acceptability of likely cost • Local delivery brings risks (particularly in terms of quality and consistency)

Each of the options for establishing a signposting service requires the development and maintenance of a comprehensive database of where consumers should take their complaints. Comprehensive information on who to complain to across the complete range of public services will require a full mapping of the existing routes. As an example of the scale of the task, the Scottish Services List includes over 800 items describing services that councils offer internally and externally to citizens.

Option 4, the creation of a single online resource with information on making a complaint about public services, was seen as having a number of advantages. This would provide consumers directly with information on who to take their complaint to and signpost them directly to the correct service with links to local websites and telephone contact details. It could also provide detailed information on a range of independent advocacy, mediation and advice agencies.

The online resource could be embedded within the existing Scottish Government website, within the proposed Direct Scot site¹⁵ or externally located. Stakeholders stressed that it was essential that the website was updated regularly otherwise it would become obsolete, and some referred to problems with existing websites which had not been maintained effectively. This suggests that the site must be clearly owned by an organisation charged with maintaining the site, rather than only developing it.

The clear drawback is that consumers report a preference for face-to-face and telephone advice on complaints rather than online advice. A key audience for the resource would therefore be service providers and advice services, who would benefit from a central resource on signposting, reducing the time and effort required by them to signpost effectively.

Options 5 and 6 go further than the online resource by introducing telephone and email based advice (option 5) and the additional option of providing face-to-face advice through existing local organisations (option 6). These options better meet the preferences of consumers; however, both would require significant additional funding.

The stakeholders consulted on the options endorsed the principle of a signposting service. This support was in part due to a concern that the current levels of informal signposting provided by public services would be difficult to sustain at a time of budget cuts. Both options 5 and 6 would provide public services with a place to direct consumers without requiring them to understand the detail of the case. It was felt that this role, and the potential cost, could be justified in terms of the wider public interest but it would be difficult for individual services to justify investing resources in individual cases (the benefit is not to the consumers of the organisation doing the signposting but to the organisation they are signposting to). They did, however, raise concerns around the funding required for such a service.

There was a clear preference for building on the expertise that currently exists rather than inventing a new body. This would suggest that option 6 would be preferred to option 5. Similarly, members of the group were positive about the suggestion of a virtual team or network of advisers rather than a new organisation or team hosted in an existing organisation. This differs from the option being pursued in Wales where one national service is to be established. Voluntary sector stakeholders were keen to stress that the service should be independent of the public sector to give consumers confidence in the information provided.

¹⁵ Scottish Government (2011) *Scotland's digital future – A Strategy for Scotland* <http://bit.ly/iK81Eu>

4 Conclusions

In many ways improving signposting – whether through a service or by other means – is simply common sense. It has the potential to make it easier for consumers who want to complain to do so, and crucially may assist some people, who would not otherwise succeed, to make a complaint. It may also make it easier for those who wish to give feedback – whether positive or negative.

The evidence reviewed and gathered for this scoping project is complex but it does, nevertheless, consistently suggest that there is a need and appetite for a signposting service.

- Despite rationalisation of the public sector complaints landscape it will continue to be complex and difficult for consumers to navigate, particularly when they have a ‘complicated’ complaint
- Consumers of public services repeatedly report lack of information as a barrier to making a complaint and the findings suggest signposting has support from the public and would improve the level of complaints reporting
- Service providers report difficulties with the current system response, with consumers reliant on the willingness of public and voluntary sector organisations to assist them with signposting. Many support the establishment of a signposting service

However, the breadth and complexity of public services, with their currently varied complaints systems and processes, means that the apparently simple problem cannot necessarily be met by a simple solution. Consumer Focus Scotland is also conscious of the pressures on public sector budgets and a number of stakeholders, while supportive of the general aim of a signposting service, queried the acceptability of the likely cost at a time of budget restraint. Our recommendation is therefore that the Scottish Government develop a signposting service in two distinct phases.

A first step would be to develop a *web-based information tool for consumers and advice agencies (option 4)* to improve accessibility by providing a single, comprehensive set of information for consumers about making a complaint about public services. Good-quality information is the cornerstone of empowerment and this could provide the foundation on which to build public information about how to make a complaint as well as making immediate improvements to signposting. The mapping of existing complaints processes could also inform consideration of subsequent improvements to signposting.

This conclusion parallels that made in the recent report of the Civil Justice Advisory Group. *Ensuring effective access to appropriate and affordable dispute resolution*¹⁶ recommends, among other things, the establishment of a web-based system bringing together information on rights, responsibilities, sources of self-help and advice and options for dispute resolution, which would guide people through the dispute resolution process. They argue that the web-based system should be interactive, providing more sophisticated advice about the options available to people in relation to their particular circumstances, and guiding them through the dispute resolution process through the use of information, multi-media and intelligent questions. The report also raises the possibility of using web-based systems for lodging court forms online.

While civil justice encompasses a much wider set of issues than complaints about public services, Consumer Focus Scotland believes that these proposals should be developed in tandem to avoid potential duplication. In particular, the creation of a 'one-stop shop' would have significant benefits for consumers and the agencies that provide them with advice and support.

While primarily developed for consumers, we would expect this resource to be of use to public services which currently provide an informal signposting service, by reducing the level of research required in order to answer a consumer enquiry. We would also suggest that 'professional-focused' information could be made available online, possibly through a password-protected advisers' site (option 2). The recent proposals to introduce Direct Scot would provide an obvious host for this information¹⁷.

The second phase would be to develop a national signposting service. This study uncovered support for the creation of a national signposting service, particularly if this was designed as a shared service across a number of public services. Consumers could be provided with a single telephone number to contact for a national signposting service (option 5) or face-to-face advice could be provided by existing organisations from a variety of existing locations (option 6). If established, the signposting service could take over ownership of the web-based information resource to ensure it is regularly updated.

¹⁶ Consumer Focus Scotland (2011) *Ensuring effective access to appropriate and affordable dispute resolution: The final report of the Civil Justice Advisory Group* available from <http://consumerfocus.org.uk/g/4p7>

¹⁷ Scottish Government (2011) *Scotland's digital future – A Strategy for Scotland* <http://bit.ly/iK81Eu>

Consumer Focus Scotland believes that there is merit in developing a telephone and/or face-to-face signposting service, in addition to the web-based information service. This is particularly the case given the strong consumer preference for face-to-face or telephone-based advice and support.

There is also a compelling argument that such a service should be located in an organisation that already has a high level of public recognition for providing advice and support on making complaints about public services, such as Citizens Advice Bureaux. This would also allow links to be made between a signposting service and more in-depth advice and support.

However, given reductions in current public sector spending we believe that an evaluation of the web-based service should be carried out before any telephone or face-to-face signposting service is taken forward. This evaluation should consider the extent to which the web-based service meets the consumer need for a signposting service. If a continuing need is identified, we would recommend that the Scottish Government explore the possibility of establishing it as a shared service between local authorities, health boards and other public services.



5 Recommendations

Recommendation 1: The Scottish Government should develop a web-based complaints signposting service. To achieve this, they should:

- carry out a comprehensive audit of routes for complaints about public services
- Use this audit to develop a web-based tool to provide information for consumers and advice agencies on where to take complaints about public services
- ensure that this web-based tool is developed in tandem with any wider civil justice web-portal to avoid duplication
- develop ‘professional-focused’ information, such as direct contact details and named personnel to be made available through a password-protected advisers’ site
- ensure that the web-based tool can be monitored to provide information on trends in complaints about public services
- promote the web-based tool to advice agencies and public service providers to reduce resources spent on providing information signposting and improve the level of informal signposting
- develop and implement a communications strategy to ensure that members of the public are aware of the information
- evaluate the web-based tool within two years of its establishment to review the extent to which it meets the need for a signposting service

Recommendation 2: Should the evaluation of the web-based service show a continuing need for a telephone-based and/or face-to-face signposting service, the Scottish Government should explore the potential of developing this as a shared service between local authorities, health boards and other public services.

Appendix – Key player interviewees

Representatives from the following organisations participated in a key player interview or attended one or more of the discussions held by the Stakeholder Advisory Group.

Age Concern
Audit Scotland
Care Commission
Citizens Advice Scotland
Consumer Direct
COSLA
East Lothian Council
Grampian Police
Information Commissioner's Office
NHS Grampian
NHS Lanarkshire
NHS Lothian
Orkney Islands Council
Police Complaints Commissioner
Scottish Commissioner for Children and Young People
Scottish Government
Scottish Housing Regulator
Scottish Information Commissioner
Scottish Legal Complaints Commission
Scottish Public Services Ombudsman
West Dunbartonshire Council
Welsh Assembly Government
Welsh Public Services Ombudsman

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