



SPSO Complaints Improvement Conference 2020

Theme 2: Making Complaints work for Everyone

Supporting vulnerable people

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Model complaints handling procedure

'In addition to our legal duties in relation to equalities and accessibility, we will seek to ensure that we support vulnerable groups in accessing our complaints procedure.'

'We will report at least quarterly to senior management on:

- performance statistics, in line with the complaints performance indicators published by SPSO*
- analysis of the trends and outcomes of complaints (this should include highlighting where there are areas where few or no complaints are received, which may indicate either good practice or that there are barriers to complaining in that area).'*

How do we assess vulnerability?





Types of vulnerability - personal

- Learning difficulties;
- Mental health problems;
- Physical disabilities;
- Poor literacy or numeracy skills



Types of vulnerability - situational

- Chronic or terminal illnesses;
- Addiction issues;
- Being a person with a conviction;
- People fleeing domestic abuse;
- Being a young person leaving local authority care;
- Being a kinship carer;
- Being a lone parent;
- Experiencing separation, relationship or family breakdown;
- Having responsibility as a main care giver;
- Homelessness or threat of homelessness;
- Having an unsettled way of life; and
- Leaving the armed forces.

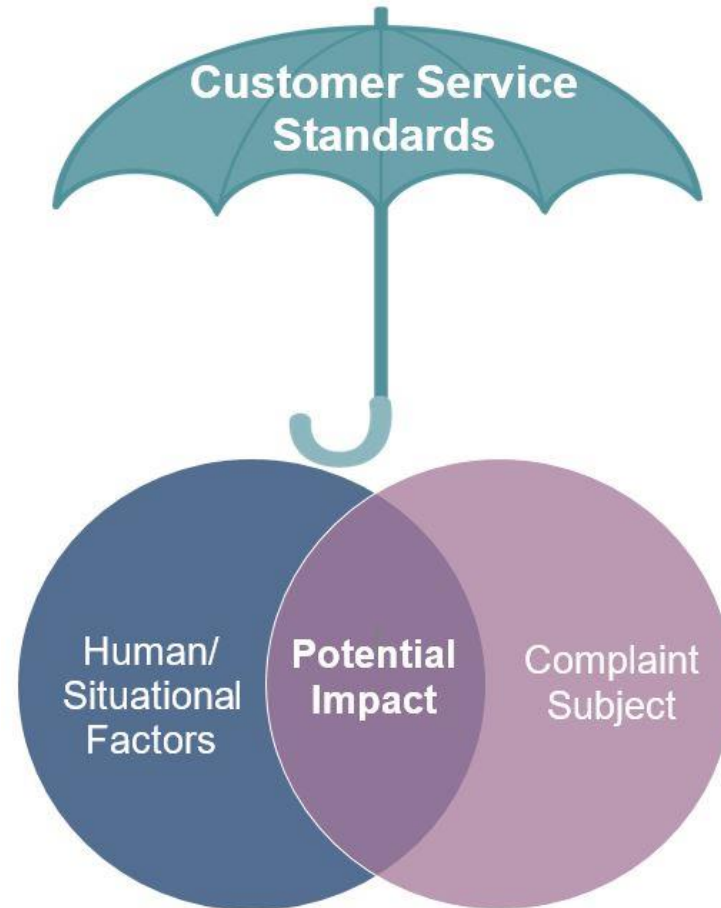
Types of vulnerability – complaint subject



Examples

- Individuals suffering from bereavement where the complaint is about the loss of a loved one
- Antisocial behaviour complaint where the individual is continuing to live within an environment where they are experiencing or have experienced antisocial behaviour
- A complaint about a care service where a loved one is still within the care setting being complained about

A complaints service that is 'universally designed'



Universal design - digital inclusion



- 22% of disabled adults have never used the internet, compared to 5% of non-disabled adults.
- 55% of disabled people who do use the internet often find web pages to be inaccessible.
- Over half of the 4.8 million adults in the UK who have never used the internet were aged 75 and over.

Universal design - advocacy services and third party support



- For users (or a specific group of users) who are subject to additional barriers to raising a complaint consider what support is required for accessing day to day services.
- Examples of appropriate actions may include:
 - helping customers access independent support or advocacy to help them understand their rights and communicate their complaints (for example, through the Scottish Independent Advocacy Alliance or Citizen's Advice Scotland);
 - providing a neutral point of contact for complaints (where the relationship between customers and frontline staff is significant and ongoing).

Universal design – capturing good practice



- Developing guidance for staff on how to identify vulnerable individuals
- Training frontline staff who provide services to vulnerable groups to help identify and put adjustments in place
- Capturing the adjustments that are being made to build up a pool of good practice



Next steps

- As well as taking account of our commitment and responsibilities to equality and accessibility, what more can we do to assess vulnerability?
- How can we better capture information on the adjustments being made for vulnerable individuals to successfully complain so that staff can learn and adapt their approach in relation to vulnerable individuals?
- How can we use our complaints data to identify where we may need to do more work to support access to the complaints process for vulnerable individuals and groups?