

CCC - Providing Feedback – Guidance for Customers

Your feedback is important to us and we welcome the opportunity for our customers to help us improve through your feedback. You can feedback to us on your own, with the help of someone else, or you can ask someone else who is content to act on your behalf.

The States of Guernsey [Customer Charter](#) sets out what level of service you should expect from us and a set of customer promises that we work to. It promises that we strive to deliver services which are:

- Courteous and fair;
- Timely and efficient;
- Accessible and provide choice;
- Accurate and relevant;
- **And provide the opportunity to give feedback and be heard.**

You can send us **compliments, complaints** or **comments** (CCC) about your experience of using any of our services. Whether you are happy or unhappy with a service provided or decisions made, or whether you would like to provide us with a suggestion for improvement, we welcome all feedback.

How do I give a Compliment or make a Comment or Complaint?

You can provide feedback in multiple ways:

- 1. Online at gov.gg/ccc** – This is the primary method of feedback we promote because it can be done at your convenience. Through gov.gg/ccc you can complete a simple online form identifying the service area you have been engaging with and let us know about your experience. We will send you confirmation that your feedback has been received.
- 2. In person** – States of Guernsey staff are always willing to listen at the time the service is being delivered or if you are attending one of our customer hubs. If you find that isn't the case and you want to offer constructive feedback or make a complaint, then please ask to see a manager so that we can resolve your concerns quickly for you.
- 3. Over the phone** – Should you prefer to provide your feedback via telephone, you will find the correct telephone numbers for all service areas by following the link: [A-Z of all Contact Details - States of Guernsey \(gov.gg\)](#).
- 4. By post** – You may choose to write to us, if you are not sure where to write to, please call the service in question and we will provide the necessary details. Alternatively, you will find the correct addresses for service areas by following the link: [A-Z of all Contact Details - States of Guernsey \(gov.gg\)](#). Be sure to provide your contact details so that we can acknowledge your feedback and inform you of how it will be processed.

- 5. By email** – Written feedback directed to the service in question in the form of email is also welcomed. This link: [A-Z of all Contact Details - States of Guernsey \(gov.gg\)](#) should provide you with the relevant email addresses. You will receive confirmation that your feedback has been received so that you know the information is being processed as required.

Please note that it will be easier for us to ensure your feedback is given proper attention if you provide us with your contact details, however, you are not obliged to do so.

Compliments and Comments

Please direct any feedback in respect of compliments and comments to the relevant service area. You will receive an acknowledgement of your feedback, and if a formal response is required, we will respond to you **within 10 working days** of receipt.

Complaints

The States of Guernsey believes it is important that a fair process is carried out in the event of a complaint being made by a customer, and where possible, in a consistent manner across the organisation. However, please bear in mind that the nature and seriousness of the complaint may have a bearing on how the complaint is handled.

Step by Step guide to how your complaint will be handled

The four-step process set out below is applicable to complaints made in respect of service delivery for all States of Guernsey services that are not identified and for which separate processes exist – refer to Service Specific Complaints Procedures section.

Step 1 – Informal Resolution

Before making a formal complaint, and if you're happy to do so, please do try talking to members of staff who you've been dealing with to resolve the matter. If you'd prefer, ask to speak to their manager. Every effort will be made to resolve the matter as quickly as possible by members of that team.

This is often the quickest and easiest way to address your concerns. If you speak to staff directly, we may be able to respond to your complaint immediately, but if further research is required, **we will let you know and respond to you within 10 working days.**

If you are not satisfied with the outcome of Step 1, you will have the opportunity to make a formal complaint and will be asked if you would like to do so.

Step 2 – Lodge a Formal Complaint

If we were not able to reach a satisfactory informal resolution with you, or if you wish to make a formal complaint, the best way to do this is via our online form ([gov.gg/ccs](#)).

If you do not want to use the online form it is possible to make a formal complaint in person, by email, by post or over the phone referencing the relevant service area.

Once the complaint has been received, an initial review will be carried out by the relevant service area and **we will aim to respond to you in writing within 15 working days**. If we need more time to complete the review, we will let you know.

If you are not satisfied with the outcome of Step 2, you will be asked if you would like to escalate your complaint further.

Step 3 – Escalation of your Formal Complaint for Investigation

Should you wish to escalate your formal complaint, please make this request in writing (either via email or by post) within 21 days of receipt of the response to your complaint.

Your complaint will be investigated by the relevant Service Lead or Director of Operations. We will aim to respond to you **in writing within a further 15 working days of your escalation request** with the outcome of that investigation.

Upon your receipt of the outcome of the investigation, the States of Guernsey will consider the matter closed, unless you make a request in writing (via email or by post) for the outcome of the investigation to be reviewed or provide new information on the matter concerned that has not already been considered.

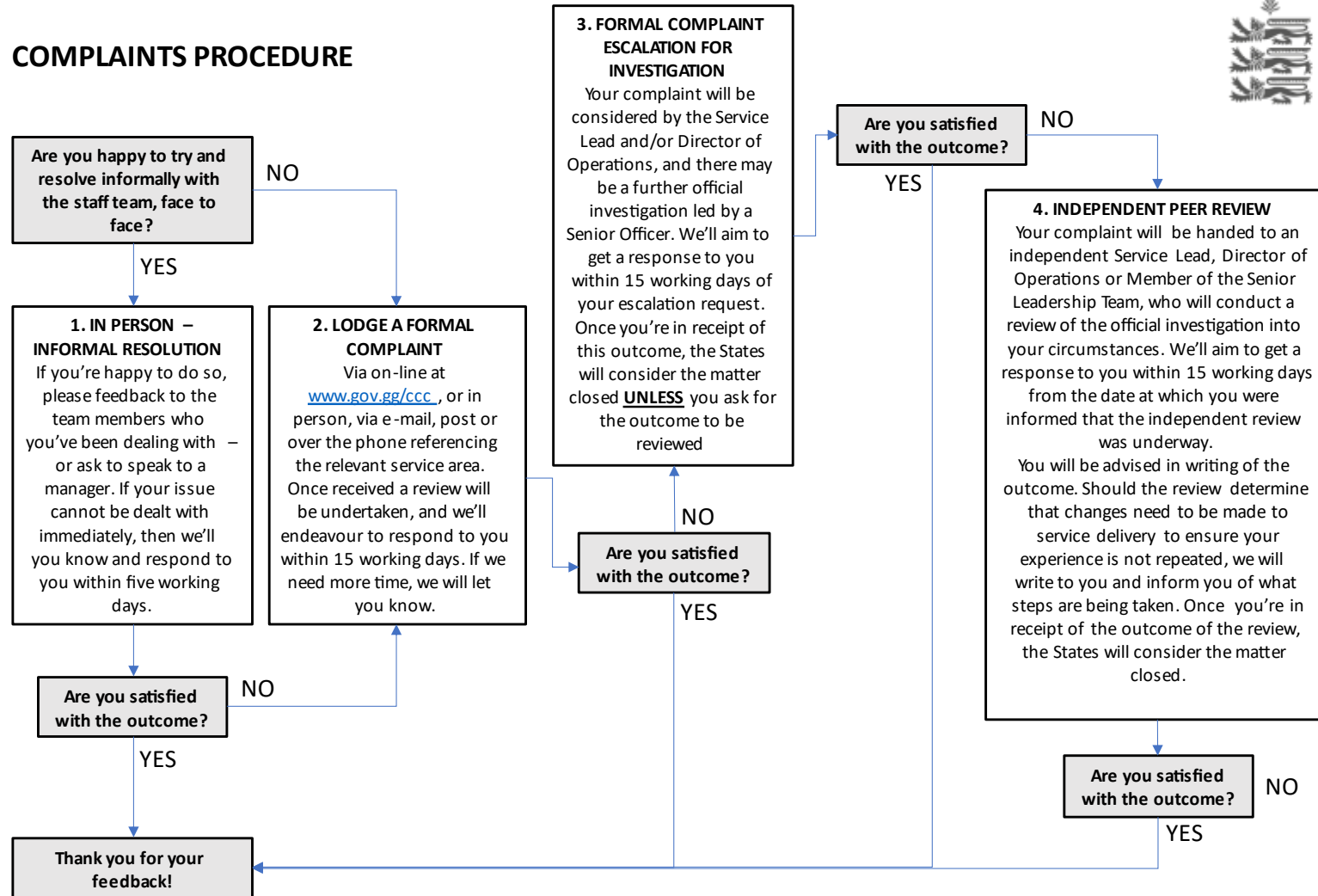
Step 4 – Appeal of the Complaint decision

To initiate an appeal, you must first be sure that you have exhausted steps 1-3 of the complaints procedure. If you remain dissatisfied with the outcome, you can request that an internal independent peer review of your case takes place. This can be achieved by requesting to appeal the outcome and/or decision following the investigation led by the Service Lead or Director of Operations, in writing (via email or by post).

Such requests will then be subject to an internal Review led by a Service Lead, Director of Operations or member of the Senior Leadership Team outside of the service you have been dealing with. During the process, the investigator will initiate an objective review of your complaint and all associated material and correspondence.

You will be advised when this process gets underway. We will aim to ensure that the review is completed and that you are informed of the outcome in writing within a **further 15 working days from the date that you were informed the peer review process was underway**.

COMPLAINTS PROCEDURE



Service-specific Complaints Procedures

As the States of Guernsey provides a range of services (and in some cases in collaboration with external stakeholders), some services maintain their own procedures for dealing with feedback and complaints that fall outside of the corporate guidance provided in this document. Those services are listed below. The associated links will take you to more information on the relevant processes to ensure the right procedure is carried out and complainants are directed through the correct resolution pathway:

Health and Social Care Services

The dedicated [Customer Care Team](#) are the first point of contact for service users to give feedback on any service or treatment that you have received from Health & Social Care (HSC) or the Medical Specialist Group (MSG).

The complaints policy and contact information can be found on the Customer Care Team webpage.

Education Services

Details of standards which apply across education services and in schools, and how you can pass on a compliment make a comment or report a complaint can be found [here](#). The States of Guernsey Early Years Team also have a separate complaints process which is set out on their website [here](#).

Please note that the process for making a comment or raising a complaint about the College of Further Education is managed by the College and the procedure is available [here](#).

Family Proceedings Advisory Service (FPAS)

A complaint must be made in writing addressed to the FPAS Manager, who will then undertake the necessary investigations and respond in accordance with internal procedures. More information can be found here: [Family Proceedings Advisory Service - States of Guernsey \(gov.gg\)](#)

Development & Planning Authority (D&PA) and Planning Service

The DP&A and Planning Service operate a formal system for dealing with customer feedback and complaints. Any complaints made are reviewed and any recurring issues identified, amendments to policies and guidance recommended and training given where necessary. The relevant information and forms can be found [here](#).

Bailiwick Law Enforcement

Complaints about Police Officers are managed under the framework of the [Police Complaints \(Guernsey\) Law, 2008](#). For a matter to qualify as a complaint under the Police Complaints Law it must be about the conduct of a serving officer of the Guernsey Police Force.

Complaints against lower-ranking police officers must be referred to the Professional Standards Department, via the following website: [Make a complaint - Guernsey Police](#), together with full contact details for the local Professional Standards and Counter Corruption Unit.

Complaints about Senior Police Officers (ranked Superintendent or above) should, be addressed to the Committee of Home Affairs, at Sir Charles Frossard House or via email Home.Affairs@gov.gg

All other complaints in relation to Guernsey Border Agency Officers and/or civilian members of staff should be dealt with in accordance with the States of Guernsey corporate procedures and guidance.

Guernsey Prison

Complaints made by prisoners are treated differently from complaints made by members of the public.

For prisoners wishing to make complaints, the Prison Order 61 'Complaints Procedure' follows the legislation as directed by the States of Guernsey delegated powers of the Home Affairs Committee. This process will be managed internally at the Prison.

All other complaints received regarding the Prison made by members of the public should be dealt with in accordance with the general complaints processes and guidance.

Royal Court

Should you wish to make a complaint in relation to customer service received at the Royal Court, you can find the relevant internal complaints procedure [here](#). Please note, however, this does not extend to appealing court decisions for which there is a separate formal process.

Trading Group

Guernsey Dairy maintains an internal policy which relates specifically to complaints/feedback concerning product quality. This is managed internally upon receipt of such complaints. The Guernsey Dairy website can be found [here](#).

The Harbour and the Airport also maintain their own complaints procedures that can be found on their websites [here](#).

All other complaints received by the organisation in respect of service delivery should be dealt with in accordance with the States of Guernsey's corporate processes and guidance, as set out above. For the avoidance of doubt, these processes should apply to all other services and functions delivered by the States of Guernsey, unless otherwise identified above. This includes services within the Customer Hub and Enabling Services (Human Resources, Finance, Intelligent Client Function, Property, Commercial).

Statutory Appeals

Customers are also able to appeal against decisions made by statutory bodies within the States of Guernsey in accordance with legislation. Statutory Appeals are handled differently to service delivery complaints. The following services have their own appeals process under existing statutory requirements or relevant legislation:

Revenue Service

Since 1 January 2022, appeals against a decision of the Revenue Service – where agreement can't be reached between the Service and the customer – have been heard by the independently formed Guernsey Revenue Service Tribunal (GRST), which has replaced the Guernsey Tax Tribunal (who previously dealt with any disputes on tax cases).

You can find more information regarding Revenue Service Appeals at the following link: [Appeals - States of Guernsey \(gov.gg\)](#)

Employment & Social Security

Under Social Security legislation, a customer cannot register a complaint against a decision of the Administrator, or the elected members of the Committee, if that decision is made under legislative provisions. In most cases, the legislative provisions allow for separate appeal systems and Social Security cannot overlay an appeal process with a complaint investigation. Social Security will always advise customers of their legal rights of appeal.

More information on Employment & Social Security appeals processes can be found on the States of Guernsey website (Gov.gg) via the links below:

- Social Insurance Appeals Tribunal: The Social Insurance Appeals Tribunal is an independent appeal body established under The Social Insurance (Guernsey) Law, 1978, to determine appeals against decisions made by the Administrator of Social Security, in respect of individuals' entitlement to various benefits. More information can be found via the link: [Social Insurance Appeals Tribunal - States of Guernsey \(gov.gg\)](#)
- [Family Allowances Appeals Tribunal - States of Guernsey \(gov.gg\)](#)
- [Income Support Appeals Tribunal - States of Guernsey \(gov.gg\)](#)
- [Employment & Discrimination Tribunal - States of Guernsey \(gov.gg\)](#)
- [Housing \(including Guernsey Housing Association\) appeals - States of Guernsey \(gov.gg\)](#)
- Legal Aid - If a customer is refused Legal Aid, they will always be told the reason why Legal Aid has been refused. In the first instance customers should write to the Legal Aid Administrator – lucyhaywood@gov.gg – within 14 days setting out the reasons why they think the decision is unfair and include any supporting evidence.

The relevant legislation can be found here: [Legal Aid \(Guernsey and Alderney\) \(Schemes and Miscellaneous Provisions\) Ordinance, 2018 \(guernseylegalresources.gg\)](#)

Development & Planning Authority (D&PA) and Planning Service Appeals

The Planning Panel was established in April 2009 under the Land Planning and Development (Guernsey) Law, 2005, as an independent statutory body to determine appeals against planning decisions made by the Development & Planning Authority. All relevant information and guidance to the appeal process can be found [here](#).

Population Management

The day-to-day administration of the Law is the responsibility of the Administrator of Population Management.

Under section 43 of the [Population Management \(Guernsey\) Law, 2016](#) an aggrieved person has the right to formerly appeal against decisions (made by the Administrator):

- (1) A person aggrieved by a decision of the Administrator under this Law may appeal to the Court against the decision.
- (2) The grounds of an appeal under this section are that:
 - (a) the decision was ultra vires or there was some other error of law,
 - (b) the decision was unreasonable,
 - (c) the decision was made in bad faith,
 - (d) there was a lack of proportionality, or
 - (e) there was a material error as to the facts or as to the procedure.

If you are unsure with regards to the grounds or route of a prospective statutory appeal, please contact the service in question, who will be happy to provide advice.

All other complaints received by the organisation in respect of service delivery should be dealt with in accordance with the general States of Guernsey's processes, as set out below. For the avoidance of doubt, these processes should apply to all other services and functions delivered by the States of Guernsey, unless otherwise identified above. This includes services within the Customer Hub (such as Traffic & Highway Services, Revenue Services and other services that come online via the Customer Hub in due course) and Enabling Services (Human Resources, Finance, Intelligent Client Function, Property, Commercial).

Administrative Review Board

The Administrative Decisions (Review) (Guernsey) Law, 1986, as amended provides members of the public with a route through the "Review Board" process to challenge actions and decisions of a States' Committee or body. This is **not** relevant to feedback and complaints regarding general service delivery. In such circumstances, the corporate complaints procedures should be followed.

The purpose of a Review Board is to decide if something significant has "gone wrong" when the decision was made, or action taken, rather than the lower threshold of "this would be the better decision the Committee or body should have made".

More information regarding the Administrative Review Board, when this is relevant and how the processes operate can be found [here](#).

If you are considering applying for a review, please contact the Principal Officer or Deputy Principal Officer to the Complaints Panel by emailing reviewboard@gov.gg to find out more information.

At what point are we unable to deal with a customer complaint?

Please bear in mind that the States of Guernsey will be unable to deal with a complaint through these processes when:

- You have been aware of the issue for which you wish to make a complaint for over six months and there are no exceptional circumstances for a delayed complaint;
- A statutory right of appeal exists (a full list of independent tribunals, review boards and panels can be found on [gov.gg](#));
- A matter is being dealt with or was previously dealt with and closed by a court, tribunal or other appeal process;
- It is a complaint against a States Member. This should be addressed to the Chairman of the [States Members' Conduct Panel](#) at the Royal Court;

The following are not considered as complaints:

- A request for information or an explanation of policy or practice;
- A request under the [Code of Practice on Access to Public Information](#) or a request under the [Data Protection legislation](#);
- An insurance claim.

Can I give feedback anonymously?

When you provide feedback, we'll encourage you to give us your contact details in case we need to get in contact with you. If you want to remain anonymous, there is an option to do so via the online form at [gov.gg/ccc](#), however, this might make it more difficult for us to look into your feedback and we won't be able to report back to you. We would really like to work with you to understand the nature of your concerns and work these through with you.

Will I be kept up to date?

Yes, if you have provided us with your contact details you will be kept up to date with the progress of the review of your feedback, and every effort will be made to respond to you within the stated time and if this is not possible we will let you know.

What is considered unacceptable?

1. Aggressive or abusive behaviour

The States of Guernsey understand that you may be angry and/or very upset about the issues that you have raised with us. If that anger or upset escalates into aggression towards staff members, it will be considered as unacceptable behaviour – any form of violence or abuse will not be accepted. In such cases we may involve the Police and/or consider legal action.

Violence is not restricted to acts of aggression that may result in physical harm. We will consider an act of violence to be behaviour that may cause staff to feel afraid, threatened or abused. We will judge each situation individually and appreciate individuals who come to us may be upset.

Language, images, signs which are designed to insult or degrade and to damage staff that is discriminatory in any way (such as the five protected grounds of race, disability, carer status, religion or belief and sexual orientation under the discrimination legislation) or which makes serious allegations that individuals have committed criminal, corrupt or perverse, unprofessional conduct without any evidence, is unacceptable. We may also decide that comments aimed not at States of Guernsey staff members but at third parties are unacceptable because of the effect that listening or reading them may have on interested parties.

2. Repeated unreasonable and persistent demands

A demand becomes unacceptable when it starts to (or when complying with the demand would) impact substantially on the day-to-day work of staff and other interested parties – including responding to other people's complaints and delivering key services into the community.

This might include (but not be limited to) such things as:

- Repeatedly demanding responses within an unreasonable timeframe
- Insisting on seeing or speaking to staff members or interested parties when that is not possible
- Repeatedly changing the substance of a complaint being dealt with or raising unrelated concerns
- Insistent on complaints being dealt with outside of existing complaints procedures and general good practice.
- Changing the basis of the complaint as the investigation proceeds
- Adopting a 'scatter gun' approach: pursuing parallel complaints in the same issue with various organisation or other people

3. Repeated unreasonable levels of contact by the Complainant

Sometimes the volume and duration of contact may cause problems. This can occur over a short period, for example, a number of calls in one day or one hour. It may occur over the lifespan of a complaint.

We consider that the level of contact has become unreasonable and unacceptable when the amount of time spent talking on the telephone, or responding to, reviewing and filing emails or written correspondence impacts on our ability to deal with your complaint, or with other people's complaints and our core public service functions and service delivery generally.

4. Unreasonable refusal to co-operate by the Complainant

When we are looking at a complaint, we may need to ask you to work closely with us. This can include agreeing with us particular aspects of the complaint we will look at (if, for example, the complaint includes several unrelated issues); providing us with further information, evidence or comments on request; or helping us by summarising your concerns or even completing a form or a document for us.

We will always seek to assist you if you have a specific, genuine difficulty complying with a request. However, we consider it is unreasonable behaviour to make a complaint and then not respond to our reasonable requests.

5. Unreasonable use of the complaints procedures by the Complainant

We accept that you have the right to complain about a service or action or lack of action undertaken by our organisation and can pursue your concerns and complain more than once if subsequent incidents occur.

However, we consider this contact to be unreasonable when the effect of the repeated complaints is to harass, or to prevent our organisation from pursuing a legitimate aim or implementing a legitimate decision. We consider access to our complaints system to be important and it will only be in exceptional circumstances that we would consider such repeated use is unacceptable – but we reserve the right to do so in such cases.

Examples of actions or behaviours grouped under this heading include, but are not limited to:

- Refusing to accept the decision in relation to the complaint.
- Submitting repeat complaints with minor additions/variations that the complainant insists amounts to 'new' complaints.

What action might we take in response to unreasonable or unacceptable behaviour?

In most cases when we consider a complainant's behaviour to be unacceptable, we should explain why and ask you to change it. We should also warn that, if the behaviour continues, we may take action to restrict your contact with our officers and offices.

However, in the event of a threat or use of physical violence, verbal abuse or harassment, defamatory or discriminatory remarks towards and about staff members and/or interested parties, staff are supported to terminate all direct contact. Staff may also wish to report incidents to the police. This will always be the case if physical violence is used or threatened.

Any member of staff who directly experiences aggressive or abusive behaviour from a complainant has the authority to deal immediately with that behaviour in a manner they consider appropriate to the situation and in line with this guidance.

We have to take action when unacceptable behaviour impairs the appropriate discharge of the organisation's or third parties' roles and duties.

It may be necessary to take action if you repeatedly call, visit the office or send a large number of documents where their relevance isn't clear. You should always be given the reason in writing as to why a decision has been made to restrict future contact, the restricted contact arrangements and, if relevant, the length of time that these restrictions will be in place. This is to ensure that you have a record of the decision, and so do staff members.