



# Annual Report of the Independent Complaints Reviewer

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2014-2015

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## Foreword

This is my first Annual Report since being appointed as Independent Complaints Reviewer on 1 April 2014.

It is also the first Annual Report by a Reviewer. Previously my role had been known as the Independent Complaints Monitor - however a change in legislation in 2012 had created a position of Independent Monitor. This is a statutory role charged with considering certain disputes about the content of an Enhanced Disclosure Certificate. There was significant potential for confusion with my role in reviewing complaints about the DBS and the DBS readily agreed to change my title to that of Reviewer. Hopefully those who may wish to make a complaint or raise a dispute about a Certificate will now find it easier to direct a complaint to the correct person.

My report is made through the Chief Executive to the Board of the DBS and is presented to the Board's Quality and Standards Committee. It is also published on the DBS website, although some of the information about individual complaints has had to be edited to take account of potential privacy issues.

Gillian Fleming

**Independent Complaint Reviewer  
Disclosure and Barring Service**

## Executive Summary

My report provides an overview of my induction, my first year in post and my remit which is detailed in the DBS Complaint Policy and Procedure. As I am not based at a DBS office, I am supported in my investigative role by a small support team at the DBS.

My report recognises that the DBS is committed to its task of providing a good service in issuing over 4 million certificates and considering 11,000 referrals for barring. I also recognise the commitment the DBS has made towards attaining Customer Service Excellence.

However, the report acknowledges that complaints do occur and the main issues I have identified are:

- Teething problems relating to transition to a new service provider specifically scanning and postal issues
- Update Service subscriptions and payments
- Continuing delays at a small number of forces

I also highlight that there is a gap in redress for applicants whose certificate has been delayed at a police force and as a consequence of this; I anticipate that soon I will see complaints about this issue.

I also acknowledge the DBS's commitment to learning from its mistakes and I detail the mitigating actions that the DBS has implemented to address the issues set out above.

Within this report I summarise 4 cases, one of which I investigated fully and reported my findings and recommendations to the Chief Executive.

Other case summaries relate to:

- an example of a case outside my remit
- a review of a determination given by my predecessor
- a premature complaint

In compiling the statistics detailed in the report, the figures were checked against published datasets and existing audited reports.

In 2014 I was commissioned by the Chief Executive to undertake a review of the DBS Complaints Policy and Procedure and my recommendations are included in this report.

## My role

The complaints procedure is at annex 1. My role as the Independent Complaints Reviewer (ICR) is to provide an independent review of complaints which have been through the DBS's internal complaints process but where the complainant is not satisfied with the outcome. The DBS chose to provide for this independent review of unresolved complaints and, to enable me to undertake the role, the DBS has given me complete access to its records and a dedicated support team based at the DBS offices in Liverpool. My team are specialists in complaint resolution, investigations, report writing and compliance.

The start of my investigation is a conversation with the complainant, to understand exactly what the customer thinks went wrong, its impact on his or her life and livelihood and what she or he thinks the DBS should do to put things right. I then establish, from the DBS's policies, guidance and procedures, what should have happened and compare this with the treatment the complainant received. I interview staff where information is not readily available. Where I find a failing, I identify the hardships and costs arising from that failure and recommend to the Chief Executive a remedy for the complainant.

But resolving the complaint for the complainant is only part of my work and I ensure that the recommendations I have made following an investigation have been properly considered and that, when accepted by the DBS's Chief Executive, the required changes have been implemented in a timely manner. My recommendations are intended to help prevent a particular complaint from happening again and are focused on improving customer service and the DBS's processes and procedures. When my recommendations are accepted, I keep under review the speed and successful delivery of these recommendations.

Where a complainant is dissatisfied with my report, or the response to it from the DBS, he or she can complain to the Parliamentary (and Health Service) Ombudsman. Normally, the Parliamentary Ombudsman will expect the complaint to have first been investigated by me.

The work I receive falls into three broad categories:

### 1. Premature complaints

These are complaints which have not been through the DBS's internal complaints process. I review these but, unless there are exceptional circumstances, I do not investigate them immediately and redirect the complaint to the appropriate part of the DBS. My team help the complainant to find the correct access point for their concern, forwarding it themselves if the complainant so wishes.

### 2. Out of scope complaints

These are complaints which may have been through the DBS's complaints process but which, after careful consideration, I have decided are not within my remit.

### 3. In scope complaints

Complaints which have been through the DBS's internal complaints process and fall within my remit, I investigate. Some complainants seek assurance that their complaint has been fairly considered and adequately remedied and will ask me to consider it. Commonly, a

complainant has lost confidence in the DBS to fully respond to their complaint or seeks additional action.

I am pleased to report that usage remains very low and that only the few contentious, unusual or highly complex complaints need to come to me. Table 1 shows that the DBS is getting better at addressing the complaints it receives and putting matters right: I issued only one report during 2014/15 about a barring referral, the other investigation being in progress at year end.

**Table 1: Complaint statistics in 2014-15**

	2014/15	2013/14	2012/13
<b>Number of certificate applications received by the DBS</b>	4,143,819	4,013,362	1,203,767
<b>All Barring casework</b>	11,336	10,425	2,608
<b>Number of complaints made to the DBS</b>	4,873	2283	224
<b>% of complaints resolved at first touch by the DBS</b>	99.8%	99%	96.8%
<b>ICR Premature enquiries</b>	16	16	4
<b>ICR Out of scope complaints</b>	4	3	3
<b>ICR Stage 4 in scope complaints</b>	2	4	0

\* DBS first year of operating was from 2<sup>nd</sup> December 2012 – 31<sup>st</sup> March 2013

## Observations from my first year

A good deal of the beginning of my year was spent in understanding better the work of the DBS, set up to ensure that employment decisions for certain roles for paid staff and volunteers are taken on the basis of correct and relevant information. It had been formed just over a year previously, on 1 December 2012, by the amalgamation of the Criminal Records Bureau (CRB) and the Independent Safeguarding Authority (ISA). These were two distinct but complementary areas with the potential to combine into a more effective single organisation.

As part of my induction, I visited both sites in Liverpool and Darlington and met a lot of the staff engaged in the core work of dealing with applications for a certificate or referrals where there is concern about a person working with vulnerable adults or children. This included staff involved in processing applications and referrals, from beginning to conclusion. The staff were very clear in describing DBS systems, as well as explaining their particular role in how applications and referrals are progressed. I also visited a Police Force team dealing with requests for information from the DBS and a Registered Body, who submit applications for certificates, so that I could appreciate where each fits into the issuing of correct certificates. Everyone I spoke to was committed to their task and sought to deliver a good service in issuing over 4 million certificates and considering around 11,000 referrals for barring.

However things can and do go wrong. Customer service complaints averaged around 410 per month during 2014-15, the total being some 4,900 over the year. The main reasons for complaint are below, but the number of complaints represented a substantial rise of over 50% compared to the previous year, with the largest increase mainly between August and November 2014.

A new complaints process and professional complaint management training and accreditation undertaken by some staff in early 2014 resulted in 99.8% of these complaints being resolved at first point of contact by the end of the reporting year, an improvement on the previous year's 99% achievement. In addition, in the latter half of the year, more staff were added to the team and others were trained to assist with prompt resolution to meet the performance standards of processing complaints despite the large increase in volume.

## Reasons for complaints

Several factors contributed to this much higher number of complaints, the most significant being the transition to a new service provider (from Capita to Tata Consultancy Services) in April 2014. In common with such changes, teething problems soon became apparent. There were scanning issues (which affected the accuracy of information captured from paper applications) and delays, coupled with contingent delivery problems with post. This presented challenges to the Call Centre who had to deal with many more customer enquiries and to Customer Services, in terms of the time and resources taken to analyse the precise reasons for particular problems so that effective solutions could be devised and put in place. In addition, there was additional work to resolve complaints and put right what had gone awry. The information available to customers was improved by the DBS as an interim measure until the technical solutions devised could reap benefits. However, as the DBS website is provided through GOV.UK, information updates could not be placed online immediately so messages for customers about any difficulties problems were somewhat delayed. This structural issue is one the DBS recognises and has sought to improve.

Another contributing factor to the higher level of complaints was the much increased use of the Update Service, designed so that applicants can opt not to have to make repeated applications for certificates. However this brought to light other technical problems with emails to customers. Again it took time to identify the precise issue, offer advice and make changes. However a 'Driving Excellence in Customer Service' Forum was also established in year to gather and use customer feedback from any source to identify more quickly emerging issues and recommend business improvements.

The other significant issue in 2014-15 was a continuing problem of delays at a small number of police forces. Any delay, including delays in police forces, can have a detrimental impact on an individual who is awaiting a certificate for employment and the organisation seeking assurance about that individual. As there was delay within the DBS, in the very early part of the year appropriate redress payments were made by the DBS and customers were not disadvantaged. A Case Management team was also created in Customer Services mid-way through 2014-15 to help deal with particular applications and escalation requests to the Police on the grounds of hardship. The DBS also took a more active approach to performance within forces, providing support and advice to develop recovery plans, share good practice and secure improvements in handling applications. This approach was successful in a number of areas with real and sustained improvements in the reduction of work in progress and older cases. The service level agreement standards agreed between the Police and the DBS are now largely being met.

However there remained a few forces with problems and such delays account for around 40% of complaints to the DBS. The DBS investigates and provides a report to the Police Force on behalf of the complainant. Providing a remedy for police failing is therefore the responsibility of the Police Force concerned. Experience to date shows this largely results not in apologies and compensation where merited, but an invitation to the complainant to pursue the matter through the courts. This is a significant concern, as a complainant is left without any satisfactory resolution. Neither does there appear to be an alternative route to independent consideration of a complaint, either by someone like myself or to an ombudsman. I have raised the issue with the DBS. While the DBS are seeking to highlight

this gap with the Home Office, complainants have no accessible means of pursuing a remedy for police delay. It is not easy for a complainant to understand why the DBS does not accept responsibility for delays, when the DBS charges a fee and pays a Police Force for its disclosure work, and police forces are apparently also unwilling to accept responsibility or even provide an explanation. I am therefore likely to see complaints about this in the coming year.

As part of its broader work to find ways to better serve citizens, the DBS established a project to achieve Customer Service Excellence (CSE) accreditation. As part of this, the DBS carried out an independent customer satisfaction survey of all external customers. 2,500 people responded, right across barring and disclosure functions and including applicants for certificates, employers, referring organisations and those who had been considered for barring. Around 94% of respondents said the DBS was professional and polite, with 89% considering it provides a valuable service that makes a real difference to public safety. Some 85% of respondents described themselves as satisfied customers. This is a positive outcome for a first survey but suggests there is room for improvement. Completion of CSE accreditation in 2015/16 will offer an opportunity to examine ways to do so.

## Case studies from 2014/15

### 1. Mrs Y

Any decisions in relation to a barring referral are a matter for the DBS and some decisions have a statutory right of appeal. Nevertheless the way in which a referral is handled and other ancillary issues can give rise to concerns which are amenable to review. My investigation was the first consideration of such a complaint by an Independent Reviewer.

In this complaint, and after it had been agreed that Mrs Y's employment should come to a mutual end, Mrs Y's employer had asked the ISA whether it should refer allegations made about Mrs Y. Mrs Y had denied the allegations and, in her complaint, made several criticisms of her former employer. However, as I explained, these were not matters I could consider.

In summary, Mrs Y's complaint was that the ISA had failed to consider properly the referral, had wrongly taken it forward in the decision making process, and took too long to make a decision. The ISA/DBS had undertaken no substantive work on the referral for some four months. The DBS had already accepted this criticism and had apologised for the undue delay in concluding the referral and writing to Mrs Y to say the matter would not be taken further.

Mrs Y complained that the ISA was not sufficiently robust when analysing the referral and supporting material and she had come to this view after researching material published by the ISA about referrals. I did not agree, as the documents indicated that the relevant initial test for the ISA's involvement of (potentially) relevant conduct was made out. Nevertheless I found that there had been opportunities for the DBS to understand and respond properly to Mrs Y's concerns. Specifically, the DBS could have identified, considered and addressed at a much earlier stage the relevance of and inconsistencies in publicly available ISA information, including ISA Factsheets which had given the impression that the ISA had a role when there was a potentially malicious referral. Opportunities to deal with her concerns about the nature and validity of the referral were not taken: the DBS had largely just repeated the steps in its decision making process without fully addressing the points she raised until some months after the end of the referral process.

I therefore concluded that the handling of the referral by the DBS once it had been accepted, and the ensuing correspondence with Mrs Y, left a lot to be desired. That, coupled with the delay, led to an extended period of concern, frustration and anxiety. Mrs Y was not provided with sufficient information at the outset about the nature of the allegations, why these might indicate a basis for the ISA's involvement or adequate details of how to contact the ISA and establish what information had been provided or to provide information if she wished to do so. Nor was she kept in touch about the subsequent delays. I did not however endorse her criticism of the DBS's handling of the referral through the decision making process or agree that, because a person referred has no formal opportunity to comment until a late stage (should the DBS be "minded" to bar), the process must overall be wholly unfair.

Once Mrs Y was aware of the referral, she had made a Subject Access Request (SAR). Her concern was to know at an early stage what information had been provided to the ISA so

that she could comment and correct any inaccuracies. She later made two other SAR requests. She criticised the extent of the material provided and the way it was redacted and pointed out that a good number of documents had already been provided to her without redaction by the employer or other organisations. In following strictly its Subject Access Request process, the DBS information was limited to that specifically referring to Mrs Y and the redactions were largely related to third parties. However I concluded that there was insufficient consideration of whether Mrs Y could have other (non-third party) information, for example about policy and information only general in nature.

I have not included here in full the recommendations I made. In summary, I sought to remedy as far as could be done the consequences to Mrs Y of the shortcomings I identified. I proposed a review of the material that had been redacted and of the information to be retained. I also suggested one of the Executive Team offer to meet with Mrs Y to discuss what had happened and repeat an earlier apology. I recommended a financial remedy, should Mrs Y wish it, to reflect the considerable time and trouble in pursuing her complaint. I also made several broader recommendations, with the aim of improving the way that referrals are handled. These included reviewing the DBS's published information to ensure it was correct and consistent; making changes to the referral form and the letters sent out when a referral has been accepted and when concluded; keeping people informed of delay; reviewing the Subject Access and redaction policies; reviewing the documents relating to retaining information, and identifying ways to ensure all correspondence with the DBS is recorded in one place. Finally, I recommended developing specific training for Barring staff in the handling of complaints. Except for one minor point about information for referrers, these were accepted by the Chief Executive. However Mrs Y was not satisfied by the outcome of her complaint, which is now being considered by the Parliamentary Ombudsman. [The Parliamentary Ombudsman decided not to pursue Mrs Y's complaint]

## 2. Mr I

Mr I's original complaint related to events dating back to 2011 and was about the CRB. My predecessor published her report and her findings in August 2013. Mr I had complained of delay and the stress and anxiety caused by this delay and his dealings with the CRB, which had adversely affected a medical condition. Mr I felt the award recommended by the ICR had not reflected adequately the severity of his medical condition or the adverse impact on his quality of life. So in 2014 Mr I provided further medical information, which he had understood to be necessary for any additional redress to be considered. Mr I and the DBS agreed I should review his complaint. In my view, the new information did not suggest the impact of his ill health was any greater than had already been taken into account by the earlier recommendation, which specifically addressed his condition. I could not therefore find sufficient reason to change that outcome.

## 3. Mrs T

Mrs T complained generally about the timescales for issuing certificates because they adversely affect those involved in teaching. The formal agreement between the DBS and the Police is that a referral to the Police has a maximum 60 day response time. However the setting of performance indicators is not something falling within my remit. Mrs T also

complained that she was not being told which Police Force was dealing with her application and, in any event, that she could not pursue this or complain until 60 days had passed. As her complaint had just been made to the DBS, my involvement would have been premature. Her complaint did however highlight the impact on customers and employers of delays and illustrate the lack of understanding of the respective responsibilities of the DBS and the Police.

#### 4. Mr R

Mr R made a complaint about the way in which the DBS had handled a referral about barring, which he thought had been made about an individual involved in social care. His main concern was that, if there had in fact been a referral, the DBS must have failed to seek out relevant information and to consider it properly and also had failed to tell him the outcome. For legal reasons, the DBS's reply could only explain generally about referrals and how those are considered.

A complaint about the substance of a barring decision is outside of my jurisdiction (as is the contents of a DBS certificate). Nor can I question policy set for the DBS by the Home Office or Central Government or the legislation under which the DBS operates. I explained this to Mr R: although those referred generally have a right of appeal against a decision to bar, there was no right of review or appeal by other people such as a third party and any DBS decision in relation to barring matters is final.

However the Chief Executive had asked me to consider whether some form of administrative review might be implemented, bearing in mind the need for confidentiality and data protection and other legislative requirements. I reported back outlining the constraints, the options open to a third party and suggesting ways in which the DBS could assure itself and citizens that, should a referral be made, barring decisions are robust and properly reached.

## Review of the DBS complaints process

The issue raised by Mr R's complaint was also incorporated into my review of the complaints process, which separately the Chief Executive had asked me to undertake. To inform my review, I looked at the complaints considered at all the escalation stages during 2013-14 and the issues in the complaints I had by then received. I reviewed a regular management report on complaint handling and spoke with a number of staff within the DBS with a role in dealing with customers and in handling complaints. I was grateful for the help I received from staff about the complaints process and in commenting on my proposals in draft form.

Some of my recommendations were made to strengthen the governance around the ICR's role, demonstrating more clearly the independence of the ICR from the DBS and enhancing the transparency and visibility of the role. My other recommendations ranged over a number of areas, with the intention of recognising systemic problems and making the process work better for complainants and easier for DBS staff to understand and apply.

It is important, for the benefit of both customers and staff, that an organisation is alert to both foreseeable difficulties and to symptoms that, unexpectedly, all is not working well. Problems can then be nipped in the bud. My review recommended ways to capture issues from the front line and across the DBS at an early stage, to limit the impact of emerging problems. In particular, I saw the Delivering Excellence in Customer Service Forum as a positive and useful means of bringing together staff throughout the DBS to exchange information about issues, agree actions and accountabilities, review progress and successes. In this way, feedback is formally connected into DBS processes and learning can be shared. I also recommended regular random sampling or audit to provide assurance to the DBS that its initial complaint handling is indeed working well or has scope to do better.

Improving the knowledge and ability of staff who deal with callers and how to deal with potential complaints is another area which can have a direct impact on how customers experience DBS services. I recommended material about complaints should be available in hard copy, for those who cannot have ready access to the internet or intranet. I also suggested the development of an e-learning package for all staff about resolving issues informally and how best to escalate problems and developing an annual training and coaching plan for Customer Relations staff. Allied to that, I recommended the nomination of a team within the Barring Service with experience of complaint handling to provide practical support to Barring staff and to Customer Relations staff investigating barring complaints.

As far as the complaints policy is concerned, I proposed a number of practical amendments to manage customer expectations and improve the timely handling of complaints:

- the policy should set out that complaints should generally be made within 12 months from the event complained of and include escalation timescales, along with an expectation that complainants will provide information the DBS reasonably requires.
- provision for review by the ICR of decisions to exclude a complaint from the process, to ensure that a complainant could question a decision they felt was wrong or unfair. In my view, the complaints procedure is not the most appropriate way for customers to challenge decisions by the DBS in relation to Subject Access or Freedom of Information requests (or data protection issues). I therefore recommended that the

DBS should revise its policies and introduce a review by a senior member of staff for complaints about whether information provided by the DBS had met its responsibilities under the relevant legislation.

My view was that the way in which formal complaints are investigated could be improved. Contacting a complainant, agreeing a statement of complaint and checking what resolution is being sought ensures that an investigation is focussed on the real issues of concern and facilitates early resolution. Sharing a draft report with a complainant is a good way of checking for inaccuracies and omissions and can likewise prevent unnecessary escalation. So I recommended those practices be introduced, as well as ensuring that each stage involved a fresh view of a complaint. I also explored the need for having three formal stages prior to my involvement and whether that led to effective and earlier resolution or just increased complainant fatigue.

The DBS's Redress Policy sets out principles but also includes a good deal of the precise practical steps staff should take. Much of this relates to Police performance issues so both that Policy and the Complaints Resolution Policy needed revision to take account of the changes to redress for such complaints. I also suggested developing a separate redress document for complaints not related to Police delay, and which more clearly referred to Barring complaints. As this should be much shorter, it would be easier to understand, navigate and apply.

I have referred above to the difficulties with obtaining redress for Police performance issues. I recommended that this, the lack of an alternative resolution mechanism and the potential accountability gap should be raised formally with the Home Office and the relevant Police and Crime Commissioners. I also suggested the DBS should explore whether the Police Force Service Level Agreement (SLA) could be varied to permit appropriate redress to be provided by the DBS and offset against Police Force financial allocations. I also recommended, for Forces consistently not meeting the 60 day performance criterion, a review of the practice of withholding from a complainant which Police Force is dealing with a referral. I also suggested further consideration of the disparity between timescales in the Police Force SLA and those that apply to the DBS.

My report and recommendations were discussed at the Board's Quality and Standards Committee and I am pleased to report that those were endorsed. The DBS is taking these forward and has assigned responsibilities for implementation. A new Complaints Resolution Policy should shortly be adopted.

## The challenges for the DBS

Looking forward, I have concerns about redress now the expectation is that Police Forces should remedy their own failings, including delay. I agree that a public organisation responsible for a delay should be held accountable, as it means an organisation will turn its attention to the in need to improve customer services. However, it takes time to address long standing difficulties and often longer to change organisational culture. It is commendable that good progress has been made with the performance of several Police Forces but the satisfactory resolution of complaints about police performance is likely to remain a difficulty for some time. There is a real risk that the current redress gap will leave some customers disadvantaged and without remedy. I can expect to deal with such complaints in the coming year and will continue to highlight this issue.

A new computer system is due to be up and running in 2016. Unforeseen issues will no doubt arise and the DBS must be alive to that and have plans in place for swiftly identifying problems and mitigating the effect on customers. This is good business practice but also good for citizens who rely on the valuable services the DBS provides. The Customer Service Excellence model and the customer service training planned for the coming year should help the DBS to meet those challenges.

## Summary

I believe the detailed and forensic nature of my investigation added value and my complaints review will lead to improvements in the level of service customers can expect. I also offer the DBS broad advice on a potential complaint or suggestions for ways of addressing concerns, if I am asked about an issue at an earlier stage in the complaints process. I am careful on the few occasions that this has happened to ensure that, in doing so, I do not compromise an impartial consideration of any subsequent referral to me. But I am also mindful that, if a complaint can be resolved to a complainant's satisfaction, the earlier this is done the better.

I place great emphasis on learning from complaints, which often highlight practical difficulties and the potential for beneficial change. This view is shared by the Chief Executive, who has accepted my recommendations to date. I also acknowledge her example of speaking to complainants herself to apologise for failings, which shows she is highly committed to customer service.

However that is only part of the process of using feedback from complaints to improve service provision. Putting action in place is also necessary. The Chief Executive receives reports upon progress of recommendations made through the complaints process. I have also followed up on my recommendations in relation to Mrs Y, seeking appropriate confirmation and evidence of implementation. I am satisfied that there has been good progress. Some actions relating to automatic notifications have been deferred, as they are more easily achievable through the new computer system being commissioned. Some changes had been quickly put in place and other recommendations have been addressed. I will continue to monitor those that remain outstanding and I will also take a keen interest in the progress of the recommendations from my complaints review.

The DBS has a significant challenge in the coming year to maintain and develop further a 'one service' customer focused culture across the organisation, where staff feel able to take responsibility for dealing with customer concerns and suggesting improvements. Training for staff is being reviewed with this in mind. Change, with the introduction of new systems and processes, will continue with increasing digitisation and no doubt will lead to novel issues which require a quick response. However I have been impressed with the willingness of staff in the DBS, and most particularly within the Customer Services team, to understand customer concerns and try to effect a resolution. That, along with a capacity to adapt swiftly, should bode well for future improvements in customer service.

## Complaints procedure Annex 1

The DBS aims to apply the [Parliamentary and Health Service Ombudsman principles of good administration](#) which outline the approach to delivering good customer service, and how to respond to customers when things go wrong.

In line with the principles we welcome all comments or suggestions on how we might improve our services. If you have cause to make a complaint about DBS please let us know as soon as possible telling us what has gone wrong and what you would like us to do to put it right.

### How to make a complaint

If you are unhappy with the way in which we have dealt with you, please contact customer relations in the first instance either by email, fax, telephone or letter setting out what has gone wrong and what you would like us to do to put it right. To help us investigate your complaint please provide:

- full details of what has caused you to make a complaint
- how you would like us to resolve your complaint
- your full name, address and postcode
- your customer reference number
- your phone/email contact details

Please address your complaint to customer relations:

- by email: [dbskomplaints@db.sgs.gov.uk](mailto:dbskomplaints@db.sgs.gov.uk)
- by fax: 0300 123 1660
- by post: DBS customer relations PO Box 165 Liverpool L69 3JD

If you would rather discuss your complaint with a DBS agent, you can call us on:

- 03000 200 190 for disclosure complaints
- 01325 953 795 for barring complaints

### When can you expect a response to your complaint

Your complaint will be handled by our dedicated customer relations advisors who will:

- acknowledge your complaint within 3 working days of receipt
- speak to you in person if appropriate to help clarify any details
- deal with you in a polite, courteous manner and act confidentially
- investigate your complaint thoroughly and put any mistakes right quickly
- aim to issue a full response in 10 working days. If this is not possible, we will contact you to explain why
- endeavour to provide you with a satisfactory resolution

If we cannot meet this target, we contact you to explain why, and arrange to agree a timescale with you, and keep you informed of progress.

Please be aware that some issues may be outside our control and as a result we may not always be able to resolve your complaint to your complete satisfaction. However we will always explain why this may be the case and provide the best resolution possible.

### What to do if you're not satisfied with the response

There is a complaint resolution model policy and a complaint is defined as any expression of dissatisfaction about the service/s provided by the DBS and/or about the professional conduct of DBS staff, including contractors. The types of complaints are (not exhaustive list):

- Poor service or failure to meet commitments
- A failure to follow policies or procedures
- Mistakes by DBS personnel
- Unreasonable delay
- Wrong or misleading advice provided
- A failure to provide explanations or give reasons for decisions
- Discrimination, inconsistency or lack of objectivity
- Inappropriate staff behaviour, discourtesy, disrespect or rudeness.

Barring decisions will not be treated as complaints, as there are other legislative forms of redress already available i.e. Appeals/Reviews, and are therefore out of scope of this policy.

#### Stage 1 - Head of Customer Relations review

If you are not satisfied with the response you have received from the DBS Customer Relations Team, please escalate your complaint to the Head of Customer Relations.

#### Stage 2 - Director of Operations investigation

If you are not satisfied with the Head of Customer Relations response, please escalate your complaint to the Director of Operations.

#### Stage 3 - Chief Executive review

If you are not satisfied with the Director of Operations response, please escalate your complaint to the Chief Executive.

Please address your escalated complaint to the correct stage and submit full details in writing about why you are not satisfied with earlier responses:

- by email: [dbskomplaints@dbs.gsi.gov.uk](mailto:dbskomplaints@dbs.gsi.gov.uk)
- by post: DBS customer relations, PO Box 165, Liverpool, L69 3JD

We will contact you within 3 working days to acknowledge your escalated complaint and advise you of when you should expect a response. For Head of Customer Relations reviews this should be within 10 working days. If a complaint is escalated to the Director of Operations or the Chief Executive, a response can take up to 20 working days so that a thorough investigation can take place.

## If you remain dissatisfied

If you have completed our internal complaints escalation process and you are not satisfied with the final response from the DBS Chief Executive, you can ask for your complaint to be investigated by the Independent Complaint Reviewer (ICR). The ICR will normally only investigate a complaint if the DBS has been given the opportunity to resolve the matter via its internal escalation process and you have received a final response from the DBS Chief Executive.

The ICR is independent and impartial, the service is free, and you can contact the ICR office:

- by email: [icr@dbs.gsi.gov.uk](mailto:icr@dbs.gsi.gov.uk)
- by post: Independent Complaint Reviewer, PO Box 165, Liverpool; L69 3JD