GDS : HSC COMPLAINTS PROCESS GUIDANCE PACK

Implementation Date: 1st January 2026
Guidance issued by: Strategic Planning and Performance Group (SPPG)
Primary Care Directorate

The Northern Ireland Public Services Ombudsman (NIPSO) has developed a new Model Complaints Handling Procedure (MCHP), which will be fully implemented on **1st January 2026**. This guidance pack, along with the supporting documents attached, provides information and resources to support the implementation of the revised procedure within primary care.

The updated MCHP policy is designed to:

- strengthen local and regional learning
- support the identification of key themes and trends
- promote a consistent and streamlined approach to complaints handling.

The MCHP procedure is a requirement set by the Northern Ireland Public Services Ombudsman, not a process devised by the Strategic Planning and Performance Group (SPPG).

However, to assist practices in meeting the NIPSO requirements, the SPPG has developed a standardised complaints submission form and accompanying guidance. These resources are intended to help practices comply with NIPSO's complaints procedure while also reducing some of the administrative burden associated with the new requirements.

By using this form and completing the monthly return, practices will be supported in meeting the Ombudsman's requirements for the reporting and handling of complaints.

The attached guidance pack and the supporting documents outline the reporting arrangements, submission requirements, key deadlines, and the resources needed to ensure compliance with NIPSO's revised procedures.

Monthly Submission Process

- A Microsoft Form link is **shared in this email** and will remain active for the full calendar year.
- Practices must submit **all closed complaints from the previous month** using this link.
- Submission **deadlines for each month** are provided in **Appendix 2.**
- Each closed complaint must be submitted **separately**.
- If there are no closed complaints, a **nil return** must be submitted via the form.
- Please provide a **secure email address** when completing the form, as you will receive a reference number and a copy of your submission which you can retain for your records.

Submission Requirements:

- Each submission must include a **brief, anonymised summary of the complaint and the response issued.**
- For complaints involving:
    - **clinical or professional concerns,** and/or
    - any **risk or potential risk to patient safety**

  the form must be completed in full, **and** the relevant anonymised correspondence sent to complaints.sppg@hscni.net. Please include the reference number from your form submission.

- For all other complaints, only the completed Microsoft Form is required. No correspondence needs to be submitted.

Monthly Submission Deadlines

- All closed complaints from the previous month must be submitted before the monthly closedown.
- Submission dates for the remainder of the calendar year can be found within Appendix 2 of this guidance pack.

Thank you for your cooperation. If you require any further assistance or support with the process, please contact complaints.sppg@hscni.net . We hope this streamlined approach will ease some of the administrative burden and support you in managing complaints more efficiently.

Appendix 1a – Definitions for grading and outcomes *

Please find Risk Matrix attached, outlining the process

Grading of complaint	Definition
Low	Risk scoring 1 – 3
Medium (advised if linked to AI)	Risk scoring 4 – 6
High (advised if linked to AI)	Risk scoring 8 – 12
Extreme (advised if linked to AI)	Risk scoring 15 – 25

*** Further guidance is to be issued from the DOH regarding the application of risk ratings to complaints. The Department of Health are also to confirm whether risk rating applies to both Stage One and Stage Two, or solely to Stage Two complaints.**

Appendix 1b – Definitions of outcomes of complaint

Outcomes of complaint	Definition
Resolved	A complaint is resolved when both the organisation and the customer agree what action (if any) will be taken to provide full and final resolution of the complaint.
Upheld	Complaint accepted
Not upheld	Complaint not accepted
Partially upheld	Part of the complaint is accepted

Appendix 2 - Monthly Closedown Submission Dates for 2026

Month	Reporting closed complaints	Submission deadline
January 2026	December 2025	Monday 26th January 2026
February 2026	January 2026	Monday 23rd February 2026
March 2026	February 2026	Tuesday 24th March 2026
April 2026	March 2026	Thursday 23rd April 2026
May 2026	April 2026	Monday 25th May 2026
June 2026	May 2026	Tuesday 23rd June 2026
July 2026	June 2026	Friday 24th July 2026
August 2026	July 2026	Monday 24th August 2026
September 2026	August 2026	Wednesday 23rd September 2026
October 2026	September 2026	Monday 26th October 2026
November 2026	October 2026	Monday 23rd November 2026
December 2026	November 2026	Thursday 24th December 2026

FAQ : Model Complaints Handling Procedure (MCHP)

1. **Are there changes to complaints governance?**

   Yes, the NIPSO Model Complaints Handling Procedure (MCHP) comes into effect on 1st January 2026. The MCHP sets the standards required by NIPSO for complaint handling, reporting and governance. The categories and sub-categories in the dataset have been defined by the Department of Health (DoH) and NIPSO.

   To assist practices in meeting the NIPSO requirements, the Strategic Planning and Performance Group (SPPG) has developed a standardised complaints submission form and accompanying guidance.

   All HSC Organisations must ensure all their staff are aware of and familiar with the MCHP and ensure they have an internal process for complaints recording and reporting. Helpful guidance and training resources regarding investigating complaints can be found on the NIPSO website: Training Resources | NIPSO.

2. **What counts as a complaint under the MCHP?**

   A complaint is defined as:

   "An expression of dissatisfaction by one or more members of the public about an organisation's action or lack of action, or about the standard of service provided by or on behalf of an organisation."

   - This covers all complaints – written, verbal or electronic.
   - All complaints must be formally recorded under the MCHP.
   - Further information and examples can be found in the FPS short guide attached and the NIPSO website.

3. **What changes are there to recording and reporting complaints?**

   The table below highlights the **key changes** to the complaints reporting process:

Procedure from 1st January 2026
All written, oral and electronic complaints must now be recorded
SPPG will be provide a Microsoft Form link for the submission of closed complaints each month.
Only redacted correspondence needs to be sent for complaints regarding clinical / professional concerns and/or a risk to patient safety
For all other complaints only the Microsoft Form needs completed

A NIL RETURN must be submitted each month via the Microsoft Form
Two stage process: **Stage 1: Frontline response** o Must respond within 5 working days (can be extended to another 5 working days if required) **Stage 2: Investigation** o Used if the complaint is more complex or if the complainant is dissatisfied with Stage 1 o Must respond within 20 days (with a possible extension of a further 20 working days) If still dissatisfied, the complainant can escalate to NIPSO for consideration.
Organisations must plan through retention and disposal schedule to retain records necessary for a complaint investigation, including by NIPSO

4. What is SPPG's role under MCHP?

SPPG continues to act as an honest broker for FPS complaints, where both parties agree. They will provide support and advice to FPS in relation to the resolution of complaints; appoint independent experts, lay persons or conciliation services where appropriate.

It will also support practices by collecting data, analysing trends and reporting regionally in line with MCHP governance standards, including externally publishing complaints information on an annual basis (as a minimum).

5. What is the difference between a complaint and a service request?

A complaint is an expression of dissatisfaction about an organisation's action or lack of action, or the standard of service provided by or on behalf of the organisation. It usually occurs when a service has not met expected standards. A service request is a routine contact where someone is asking for assistance, information or access to a service, and no dissatisfaction has been expressed. Please see the MCHP FPS guidance for further examples.

6. When will the link be issued?

The Microsoft Form link is released in this email to coincide with the launch of the new process beginning 1st January 2026. The link will remain open for the full calendar year; however, closed complaints should be submitted each month before the monthly close-down date. Submission deadlines are outlined in Appendix 2.

7. **Will I receive a reference number for each submitted closed complaint?**

   Upon submission, a copy of the completed form and your reference number will be sent from complaints.sppg@hscni.net to the secure email address provided in the form. Please ensure a secure email address is provided when completing the Microsoft Form.

8. **What if a submission is not made before the monthly close-down date?**

   Closed complaints or nil returns should be reported one month in arrears and must be submitted each month prior to the closedown date. If a submission is missed, include the missed complaints in the next month's submission. Please clearly indicate the month that the complaint closed when completing the form so that the data can be recorded accurately.

   For reference, a list of submission dates for 2026 are provided within Appendix 2.

9. **Why does the form ask for a GDC number, and how will this information be used?**

   The GDC number section should only be completed if the complaint relates to *clinical and/ or professional concerns, and/*or if it involves a *risk or potential risk to patient safety.* This information is only required when a dentist is directly involved in the clinical or professional matter being reported. It does not apply to a dentist who is simply handling or responding to the complaint on behalf of the practice.

   When required, including the GDC number ensures the complaint can be processed correctly and efficiently, allowing the issue to be reviewed by the appropriate teams where clinical and professional elements are involved.

10. **Why do I need to submit a nil return?**

    If there are no closed complaints, a **nil return** must be submitted via the form. This requirement ensures consistent reporting across all providers and helps demonstrate your practice's compliance with MCHP reporting requirements. Please note that one nil return form must be completed per month, as we are unable to process multiple entries on a single form.

11. **What will happen if the practice doesn't submit monthly reports?**

If practices fail to comply with the reporting requirements, they will receive reminders from the Complaints Team (SPPG). NIPSO will also monitor compliance with MCHP through the complaint's investigations and liaison with organisations. This may include quality checks of published complaints data, as well as reviewing information and guidance on an organisation's complaints procedures. Where NIPSO identifies concerns regarding complaints handling, it will provide feedback to support resolution. Statutory powers are generally only used if necessary improvements are not implemented.

(Source: MCHP, Page 44, Para 3.3)

12. Where can I find information about the definitions for grading a complaint and outcomes?

Guidance for definitions is provided in Appendix 1a and Appendix 1b of this guidance pack.

13. Where can I find additional resources?

- Training resources and eLearning: NIPSO website Training Resources | NIPSO
- Guidance and support: complaints.SPPG@hscni.net

Closed Complaints :

Monthly Submission Process

Submission Process

- All closed complaints should be submitted through the Microsoft Form link
- The link will remain active for the full calendar year.
- A**ll closed complaints from the previous month** should be submitted before the monthly close down date
- Each closed complaint must be submitted **separately**.
- If there are no closed complaints, a **nil return** must be submitted via the form.
- Provide a **secure email address** when completing the form, as you will receive a reference number and a copy of your submission which you can retain for your records.

Submission requirements

- Each submission must include a **brief, anonymised summary of the complaint and the response issued.**
- For complaints involving:
    - **clinical or professional concerns,** and/or
    - any **risk or potential risk to patient safety** the form must be completed in full, **and** the relevant anonymised correspondence sent to complaints.sppg@hscni.net. Include reference number from form submission.
- For all other complaints, only the completed Microsoft Form is required. No

Monthly Submission Deadlines

- All closed complaints from the previous month must be submitted before the monthly closedown.
- Submission dates for the remainder of the calendar year can be found within the HSC Complaints Process guidance pack.

If you require any further assistance or support with the process, please contact complaints.SPPG@hscni.net. We hope this streamlined approach will ease some of the administrative burden and support you in managing complaints more efficiently.