

**Openness and Accountability Consultation - Appendix B
INTERNAL COMPLAINTS PROCEDURE**

| ID Number | Respondent | PROPOSALS | | | |
|-----------|--|--|--|--|---|
| | | 1 - There should be only two levels of attempted resolution of a complaint before the complaint may be referred to the Ombudsman for adjudication. | 2 - Referral of a complaint from first level resolution to second level resolution should not follow the management line | 3 - Attempted resolution of complaints should be subject to a time limit | 4 - Complaints handling generally should seek to follow the guidelines of draft international standard ISO/DIS 10018:2002 |
| 1 | Medway Ports | Disagree. | No view expressed. | Agree. | No view expressed. |
| 2 | Witham Fourth District Internal Drainage Board | No view expressed. | No view expressed. | No view expressed. | No view expressed. |
| 3 | Haringey Council | Agree. | No view expressed. | Agree. | |
| 4 | Safe Anchor Trust | Agree. | Agree. | Agree. | Agree. |
| 5 | Inland Waterways Association | Agree. | Agree. | Agree. | Agree. |
| 6 | Residential Boat Owners Association | Agree. | Agree. | Agree. | Agree. |
| 7 | Manchester Bolton & Bury Canal Society | Agree. | Agree. | Agree. | Agree. |
| 8 | National Association of Boat Owners | Unable to agree without clarification. | Agree. | Agree. | Agree. |
| 9 | Roberty Wynn & Sons Ltd | Agree. | Agree. | Agree. | Agree. |
| 10 | Inland Waterways Amenity Advisory Council | Agree. | Agree. | Agree. | Agree. |
| 11 | Calder Navigation Society | Agree. | Disagree. | Agree. | Agree. |
| 12 | Scottish Inland Waterways Association | Agree. | Agree with reservation. | Agree. | Agree. |
| 13 | Association of Waterways Cruising Club | Agree. | Agree. | Agree. | Agree. |
| 14 | Cathiron Marina Ltd | No view expressed. | No view expressed. | No view expressed. | No view expressed. |
| 15 | Royal Yachting Association | Agree. | Agree. | Agree. | Agree. |
| 16 | Waterways Ombudsman | Agree. | Agree. | Agree. | Agree. |
| 17 | Association of Pleasure Craft Operators | Agree. | Agree. | Agree. | Agree. |
| 18 | Falkirk Council | No view expressed. | No view expressed. | No view expressed. | No view expressed. |
| 19 | Birmingham Friends of the Earth | No view expressed. | No view expressed. | No view expressed. | No view expressed. |
| 20 | Willowtree Marina Ltd. | Agree. | Agree. | Agree. | Agree. |
| 21 | Ramblers' Association | Agree. | Agree. | Agree. | No view expressed. |
| 22 | The Manchester Ship Canal Company | Agree. | Agree. | Agree. | Agree. |
| 23 | The Kennet & Avon Canal Partnership | Agree. | Agree. | Agree, with reservations. | Agree. |
| 24 | The Steam Boat Association of Great Britain | Agree. | Agree. | Agree. | Agree. |
| 25 | West Dunbartonshire Council | No view expressed. | No view expressed. | No view expressed. | No view expressed. |
| 26 | The Yacht Harbour Association | Disagree. | Disagree. | Agree. | Agree. |
| 27 | The British Marine Federation | Agree. | Agree. | Agree. | Agree. |

| ID Number | Respondent | QUESTIONS | |
|--------------|--|---|--|
| | | Do you think the proposals will be an improvement to current complaints handling by BW? | Do you think the imposition of a time limit for attempted resolution of complaints feasible? |
| 1 | Medway Ports | No. | Yes. |
| 2 | Witham Fourth District Internal Drainage Board | No view expressed. | No view expressed. |
| 3 | Haringey Council | Yes, overall. | Yes, overall. |
| 4 | Safe Anchor Trust | Yes. | Yes, overall. |
| 5 | Inland Waterways Association | Yes, overall. | Yes. |
| 6 | Residential Boat Owners Association | Yes. | Yes, overall. |
| 7 | Manchester Bolton & Bury Canal Society | Yes, overall. | Yes. |
| 8 | National Association of Boat Owners | Yes. | Yes. |
| 9 | Robert Wynn & Sons Ltd | Yes. | Yes, overall. |
| 10 | Inland Waterways Amenity Advisory Council | Yes, overall. | Yes, overall. |
| 11 | Calder Navigation Society | No view expressed. | Yes, overall. |
| 12 | Scottish Inland Waterways Association | Yes. | Yes. |
| 13 | Association of Waterways Cruising Club | In general, yes. | Yes, overall. |
| 14 | Cathiron Marina Ltd | No view expressed. | No view expressed. |
| 15 | Royal Yachting Association | Yes. | Yes. |
| 16 | Waterways Ombudsman | Yes, overall. | Yes, overall. |
| 17 | Association of Pleasure Craft Operators | Yes. | Yes. |
| 18 | Falkirk Council | Yes, overall. | Yes, overall. |
| 19 | Birmingham Friends of the Earth | No view expressed. | No view expressed. |
| 20 | Willowtree Marina Ltd. | Yes, overall. | Yes. |
| 21 | Ramblers' Association | Yes. | Yes. |
| 22 | The Manchester Ship Canal Company | Yes. | Yes. |
| 23 | The Kennet & Avon Canal Partnership | Yes. | Yes. |
| 24 | The Steam Boat Association of Great Britain | Yes. | Yes. |
| 25 | West Dunbartonshire Council | No view expressed. | No view expressed. |
| 26 | The Yacht Harbour Association | No. | Yes, overall. |
| 27 | The British Marine Federation | Yes. | Yes. |

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Do you have any other suggestions for improvement to the proposed BW Internal Complaints Procedure?

1. Medway Ports

It is essential that lessons are learnt from the subject and resolution of a complaint and promulgated widely throughout the business. Current wording of the proposals implies the ICP will still have three levels, with the service manager's involvement included. If time limits are not met, the case should be upheld.

2. Witham Fourth District Internal Drainage Board

No view expressed.

3. Haringey Council

Suggests that a trial period be established to assess whether proposed time limits are sufficient in the bulk of cases to provide a full and considered response.

4. Safe Anchor Trust

The time limit may be unworkable based on employees' other responsibilities. Suggest 25 days' time limit.

5. Inland Waterways Association (IWA)

Complaints unresolved after the second level of the ICP is exhausted, and which fall beyond the remit of the Ombudsman, could be referred to a body such as IWAAC for independent adjudication. The complainant should be advised at an early stage that their case is under investigation, and regular progress reports should be issued if reconciliation time is lengthy, e.g. when dealing with complex matters, when requiring site visits, staff interviews, etc.

6. Residential Boat Owners' Association (RBOA)

Some complaints may require additional time for detailed investigations - this should be mutually agreed between parties. Progress reports should be regularly issued if this is the case. Other recourse to the complainant should be available should a complaint after second level be deemed outside of the Ombudsman's remit. Examples of such cases should be readily available to assist a complainant.

7. Manchester Bolton & Bury Canal Society

No view expressed

8. National Association of Boat Owners (NABO)

The role of the Waterway Service Manager in handling a complaint must be clarified. Confusion currently exists between Paragraph 10 and Proposal 1 of the consultation document

9. Robert Wynn & Sons Ltd.

Complaints unresolved after the second level consideration should have recourse to further adjudication. Information relating to the full complaint procedure should be widely publicised. With the agreement of the complainant, details of cases fully considered within the ICP should be made available.

10. Inland Waterways Amenity Advisory Council (IWAAC)

Improved levels of service at waterway level will prevent complaints arising. Staff performance should be monitored and audited. Where 2nd level resolution cannot be reached, and the case falls outside of the Ombudsman's remit, IWAAC and the proposed National Consultative Council could adjudicate.

11. Calder Navigation Society

Proposal 2 - direct line management should take responsibility for attempted second level resolution. An independent Ombudsman is still available at level three. If time limits are exceeded the complainant should be provided with progress reports.

12. Scottish Inland Waterways Association (SIWA)

Paragraph 11 refers to BW staff roles not replicated in Scotland. Alternative suggestion is for 1st level to be considered by the Scottish Director, and 2nd level consideration be given by BW's Chief Executive. User Associations should, on invitation of the individual complainant, be able to represent or attend meetings between parties with no resulting breach of confidentiality by BW on full disclosure of the facts.

13. Association of Waterway Cruising Clubs

Flexibility in extending time-scales for each stage of resolution should be mutually agreed between each party. Complaints outside of the Ombudsman's remit and having completed the ICP should be considered by IWAAC. IWAAC's role should be enhanced accordingly.

14. Cathiron Marina Ltd.

No view expressed

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15. Royal Yachting Association (RYA)

Assurance should be given that letters sent to local BW offices are acknowledged promptly and a substantive response forthcoming.

16. Waterways Ombudsman

Publicity should be substantially increased to encourage greater understanding of the ICP. Important to ensure that at second level stage a Director is fully supported in the gathering of evidence so as to not delay the complaints process unduly. It should not require BW to formally acknowledge a case should be taken to the Ombudsman before the case begins to be considered by the Ombudsman. Extensions to time limits should only be agreed between BW and the complainant(s); the Ombudsman should not be involved.

17. Association of Pleasure Craft Operators

No view expressed.

18. Falkirk Council

No view expressed.

19. Birmingham Friends of the Earth

No view expressed.

20. Willowtree Marina Ltd.

A strict internal control system should be established to ensure complaints are responded to fully within the time limits specified. It must be emphasised throughout the new Business Units that all customer complaints should be dealt with thoroughly and professionally.

21. Ramblers' Association

The complaints procedure should be widely publicised. Provision should be made for the Service Manager not to be involved in complaints relating to their area of work.

22. The Manchester Ship Canal Company

No view expressed.

23. The Kennet & Avon Canal Partnership

Action must be seen to be coming from the resolution of complaints, rather than lip service. Impositions of time limits towards resolution are fine, but must take into account general staffing and work commitments of staff involved. The introduction and publication of standard reply time standards for the initial, pre-complaint stage of BW procedure should be considered.

24. The Steam Boat Association of Great Britain

There is a fine line between complaints, comments and enquiries. All three deserve an equally timely and effective response.

25. West Dunbartonshire Council

No view expressed.

26. The Yacht Harbour Association (TYHA)

The ICP should not by-pass the Chief Executive's Office even if this adds a third level of attempted resolution. Referral from first to second level should follow the management line unless specifically requested by the complainant.

27. The British Marine Federation (BMF)

We feel that using the Chief Executive's office as the ultimate referral of complaints within the ICP should be considered.