

HQIP Complaints Policy

Document control

Policy owner: Corporate Services, CORE

Operational lead: Communications Team, in liaison with the Data Protection Officer where relevant

Approval route: Board annual approval. SMT approval for interim amendments

Register owner: Corporate Services

Review cycle: Annual review, or earlier if required

Effective date: 19 June 2026

1. Purpose

Healthcare Quality Improvement Partnership (HQIP) is committed to delivering high quality services, acting transparently, and maintaining strong and respectful relationships with patients, the public, partners, commissioned providers, customers, suppliers, funders and wider stakeholders.

Most feedback received by HQIP is positive, but we recognise that concerns may arise from time to time. This policy explains how individuals and organisations can raise a complaint, and how HQIP will respond.

The purpose of this policy is to ensure that complaints are handled promptly, fairly, consistently and constructively. This includes complaints about the quality of our work, our processes, our communications, our customer service, our decision making, or the conduct of HQIP staff, contractors or representatives acting on our behalf.

Data protection complaints are managed by HQIP's Data Protection Officer. This policy explains how such complaints can be raised and how they will be directed to the appropriate process.

2. Policy statement

HQIP takes complaints seriously. We are committed to listening carefully, treating complainants with respect, putting things right where we have fallen short, and learning from concerns that are raised with us.

HQIP will ensure that:

- Complaints are acknowledged, reviewed and responded to in a timely manner.
- Complainants are treated with courtesy, sensitivity and fairness.
- Complainants are not disadvantaged because they have raised a concern or complaint.
- Complaints are reviewed by an appropriate person with sufficient independence from the matter being complained about.
- Responses are clear, proportionate and evidence based.
- Appropriate remedial action is taken where a complaint is upheld or partially upheld.
- Learning from complaints is used to improve our services, processes, governance and communications.

HQIP also welcomes feedback, concerns and suggestions where a person does not wish to make a formal complaint.

3. What is a complaint?

A complaint is any expression of dissatisfaction, whether written or verbal, about HQIP's work, processes, communications, customer service, decisions, or the conduct of HQIP staff, contractors or representatives, where a response or resolution is expected.

Complaints may include concerns about:

- The accuracy, clarity or quality of HQIP outputs.
- The way HQIP has communicated with an individual or organisation.
- Delays in responding to enquiries or progressing work.
- The way HQIP has made or explained a decision.
- The conduct of HQIP staff, contractors or representatives.
- The way HQIP has commissioned, overseen, managed or escalated work delivered on its behalf.
- The way HQIP has handled a concern raised about a commissioned provider.

4. Data protection complaints

A data protection complaint is a complaint about the way HQIP has handled personal information.

Examples of data protection complaints include concerns that:

- An individual has not received all the personal information they are entitled to receive in response to a subject access request.
- Personal information has not been kept secure.
- Personal information held by HQIP is inaccurate.
- Personal information has been shared with someone else in error.
- Personal information has been kept for longer than necessary.
- Personal information has been used for a purpose other than the purpose originally explained.
- HQIP has not properly handled or responded to a data protection rights request.

Data protection complaints should be emailed to: Data.Protection@hqip.org.uk.

Where a data protection complaint is received through any other route, including complaints@hqip.org.uk, the website, telephone or post, it will be referred promptly to the Data Protection Officer or the Information Governance team.

5. What is not handled under this policy?

This policy does not normally cover:

- General feedback, comments or suggestions where no formal response is required.
- Requests for information, unless the complaint is about how the request has been handled.
- Employment matters raised by HQIP staff, which should be handled through the relevant internal HR policy.
- Safeguarding concerns, fraud concerns, bullying or harassment concerns, whistleblowing matters, data breaches, or other matters already covered by a specific HQIP policy or procedure.
- Clinical care, treatment decisions or clinical records. These should be raised with the relevant care provider or organisation. HQIP does not provide clinical care and does not hold clinical records.
- Matters that are clearly the responsibility of another organisation.

- Complaints about services delivered by organisations contracted by HQIP, where the issue relates solely to that organisation's direct operational delivery and not to HQIP's commissioning, oversight, management, escalation, governance or response.

Where a complaint relates to another organisation, HQIP will signpost the complainant to the appropriate organisation where possible.

Where a complaint raises concerns about HQIP's role in commissioning, oversight, management, escalation, governance or response, HQIP will consider that element of the complaint under this policy.

6. How to make a complaint

Complaints can be submitted by email, through the HQIP website, by telephone, or by post.

General complaints should be sent to: complaints@hqip.org.uk

Data protection complaints should be sent to: Data.Protection@hqip.org.uk

Complaints can also be submitted through the Contact HQIP page on the HQIP website.

Postal complaints should be sent to:

Healthcare Quality Improvement Partnership (HQIP)
c/o Buzzacott LLP
130 Wood Street
London
EC2V 6DL

Where a person wishes to raise a complaint through HQIP's funders, they can email england.contactus@nhs.net and include "For the attention of the complaints team" in the subject line.

Complaints received through NHS England about HQIP will normally be referred to HQIP for review and response. Where appropriate, the outcome may then be escalated or reported back to NHS England through the relevant contractual or governance route.

To help us respond effectively, complainants should include:

- Their name and contact details.
- A clear description of the complaint.
- Any relevant dates, documents or correspondence.
- The outcome or resolution they are seeking.
- Whether they are complaining on their own behalf or on behalf of someone else.

HQIP will provide reasonable assistance where a person needs help to make a complaint.

7. Responsibilities

Corporate Services, CORE, owns this policy and is responsible for maintaining the complaints register.

The communications team are responsible for receiving and triaging general complaints, in liaison with the Data Protection Officer where the complaint involves personal information or data protection issues.

Staff who receive complaints through any route should forward them promptly to the Communications Team.

Where the complaint involves personal information or a data protection concern, it should also be referred promptly to the Data Protection Officer or the Information Governance team.

The Director of Operations, CORE, is responsible for oversight of the general complaints process and for ensuring that appropriate action is taken where a complaint identifies a service, governance or process issue.

The Chief Executive Officer is responsible for final escalation where a complainant remains dissatisfied with HQIP's response, or where the complaint concerns a serious organisational issue.

8. How HQIP handles general complaints

8.1 Acknowledgement

HQIP will acknowledge general complaints within 5 working days. The acknowledgement will normally confirm:

- That the complaint has been received.
- Who will be coordinating the response.
- The expected response timescale.
- Whether any further information is needed.

8.2 Initial review and triage

HQIP will review the complaint to confirm:

- The nature of the complaint.
- Whether it falls within this policy.
- Whether it should be handled as a general complaint, a data protection complaint, or both.
- Whether another HQIP policy or procedure applies.
- Who is best placed to investigate and respond.
- Whether any urgent action is needed.

If the complaint does not fall within this policy, HQIP will explain why and, where possible, signpost the complainant to the appropriate organisation or process.

8.3 Investigation

Complaints will be investigated by an appropriate manager or senior member of staff. Where necessary, HQIP may appoint an independent reviewer or someone who has not been directly involved in the matter being complained about.

The time needed to investigate a complaint may depend on:

- The complexity of the issue.
- The period of time covered by the complaint.
- The number of people or organisations involved.
- The seriousness of any actual or potential harm.
- The availability of relevant records, information or staff.

- Whether input is needed from a commissioned provider, supplier, funder or other third party.

HQIP will keep the complainant informed where a complaint is complex or where more time is needed.

8.4 Response

HQIP aims to provide a written response to general complaints within 30 working days of acknowledgement. Where this is not possible, HQIP will explain the reason for the delay and provide a revised response date.

A complaint response will normally include:

- A summary of the complaint.
- The steps taken to review or investigate the matter.
- HQIP's findings.
- Whether the complaint is upheld, partially upheld, or not upheld.
- Any action HQIP has taken or intends to take.
- Information about escalation where relevant.

9. Data protection complaint handling

HQIP will acknowledge data protection complaints within 30 calendar days of receipt. This applies whether the complaint is received through the Data Protection Officer, the complaints inbox, the website, telephone, post or any other HQIP route.

HQIP will take appropriate steps to investigate data protection complaints without undue delay, keep the complainant informed, and tell them the outcome.

Where a data protection complaint forms part of a wider complaint, HQIP will handle the data protection element without undue delay. HQIP will not delay the outcome of the data protection element only because wider issues are still being reviewed.

Where the complaint concerns personal information managed with another controller, funder, commissioned provider or processor, HQIP will coordinate with the relevant organisation as appropriate while ensuring the complainant is kept informed.

Where there may be doubt about the complainant's identity, HQIP may need to ask for proof of identity before responding.

Where a complaint is being raised on behalf of another person, HQIP may ask for evidence that the complainant has authority to act on that person's behalf. This may include a signed letter of authority, power of attorney, parental responsibility documentation, or other appropriate evidence depending on the circumstances.

Individuals also have the right to complain to the Information Commissioner's Office. There is no requirement for an individual to wait for HQIP to complete an internal review before complaining to the Information Commissioner's Office.

10. Escalation

If a complainant is dissatisfied with HQIP's response to a general complaint, they may request an internal review.

The internal review will normally be coordinated by the Director of Operations, CORE.

Where the complaint involves data protection, the Data Protection Officer will be involved in the review.

Where the complaint remains unresolved, raises a serious organisational issue, or concerns a senior member of staff, it may be escalated to the Chief Executive Officer.

If the complaint concerns the Chief Executive Officer, the matter will be escalated to the Chair or another appropriate trustee.

HQIP aims to provide a final response within 30 working days of receiving the request for an internal review. Where this is not possible, HQIP will explain the reason for the delay and provide a revised response date. The Charity Commission is not a general appeal body for all complaints about charities. Complainants should normally raise complaints with HQIP first.

Where a concern involves serious wrongdoing, serious harm, significant financial loss, illegal activity, or serious charity governance concerns, the complainant may also raise the matter with the Charity Commission or another relevant regulator.

11. Serious concerns and regulatory escalation

Where a complaint raises issues that may fall under another HQIP policy or procedure, including safeguarding, fraud, bullying or harassment, whistleblowing, data breach management, or other serious governance concerns, HQIP will ensure that the matter is referred to the appropriate internal process. This does not prevent HQIP from considering any service or organisational complaint under this policy where appropriate.

Where a complaint raises a serious concern about HQIP as a charity, including serious harm, significant financial loss, serious damage to HQIP's work or reputation, criminal or illegal activity, or significant governance failure, HQIP will consider whether the matter should be escalated internally, reported to NHS England where relevant, or reported to the Charity Commission as a serious incident.

Where a serious concern involves a commissioned provider or other partner and may materially affect HQIP's work, staff, operations, finances or reputation, HQIP will consider the appropriate escalation and reporting route.

12. Remedies and learning

Where a complaint is upheld or partially upheld, HQIP will consider appropriate action.

This may include:

- An apology.
- Correction of an error.
- Clarification of a decision, process or communication.
- A revised process.
- Staff learning or guidance.
- Action with a commissioned provider or contractor.
- Escalation to a contract meeting.
- A formal review.
- Reporting to SMT, Audit and Risk Committee, the Board, NHS England, the Charity Commission, or another relevant body where appropriate.

HQIP will use learning from complaints to improve the quality, transparency and responsiveness of its work.

13. Complaints register and reporting

Corporate Services will maintain a central complaints register.

The register will record appropriate details of complaints received, including:

- Date received.
- Nature of complaint.
- Complaint category.
- Lead person or team.
- Response timescale.
- Outcome.
- Remedy or action taken.
- Learning identified.
- Whether the matter has been escalated.
- Whether the matter has been reported to SMT, Audit and Risk Committee, the Board, NHS England, the Charity Commission, or another relevant body.
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Complaint themes will be reported to SMT, the Audit and Risk Committee, and the Board.

The Board will review the policy annually. SMT may approve interim amendments where needed before the next annual Board review.

14. Confidentiality and data protection

Complaints will be handled sensitively and in line with data protection legislation.

Information provided as part of a complaint will only be shared with those who need it to review, investigate or respond to the complaint, unless there is another lawful reason for sharing it.

HQIP will keep appropriate records of complaints, responses, decisions and learning actions.

15. Managing unacceptable behaviour

HQIP recognises that people may raise complaints when they are frustrated, distressed or concerned. We will respond with patience and professionalism.

HQIP will not accept abusive, discriminatory, threatening or persistently unreasonable behaviour towards staff, contractors or representatives.

Where behaviour becomes unacceptable, HQIP may set reasonable limits on contact. This may include asking the complainant to communicate through a single point of contact, limiting the frequency of contact, or requiring communication to be in writing.

Any limits placed on contact will be proportionate and will not prevent HQIP from considering a genuine complaint fairly.

16. Accessibility

HQIP wants its complaints process to be accessible and straightforward.

Where a person needs help to make a complaint, HQIP will consider reasonable adjustments. This may include accepting a complaint in a different format, helping to clarify the nature of the complaint, or supporting the complainant to identify the appropriate route.

17. Policy review

This policy will be reviewed annually by the Board, or sooner if required because of changes in legislation, regulation, organisational arrangements, or learning from complaints.

Interim amendments may be approved by SMT.