Dear Mr Stewart

I write in response to your letter of 10 November 2015 sent to our Principal regarding the Local Government and Regeneration Committee's inquiry on the impact of recommendations made by the SPSO. Following my brief telephone call with Mr Iserhoff on 15 December 2015, the University is happy to provide the following information to assist your inquiry.

How well public sector organisations implement changes following recommendations of the SPSO

For your inquiry you have selected decision report 201304380, which relates to the University of Glasgow, and have asked for information on how we have implemented the recommendations made by the SPSO. Please refer to Annex A which provides a redacted copy of the response we provided to the SPSO in May 2015 detailing our actions arising from this case.

Observations on how this and other reports by the SPSO impact on service improvement across the University's area of responsibility

Our decision report which you have selected was a case which was considered by the SPSO over a considerable length of time as the complaint was lodged with them in December 2013 and the outcome issued in January 2015. We felt that this length of time impacted negatively for the complainant: following receipt of the SPSO's report the University offered the complainant the opportunity of a return to study at the next available opportunity, with no fees to pay. The next available opportunity was by then session 2015-16 (starting September 2015). If the outcome had been issued at any time up to September 2014 (i.e. up to nine months after it had been lodged with the SPSO), the first available opportunity would have been session 2014-15 (starting in September 2014). The complainant did not take up the opportunity offered. It is not known whether the delay contributed to his decision not to return to study.In terms of service improvement, the commentary supplied in Annex A refers to the fact that internal review and change of process had been happening in the intervening period between the events which were the subject of the complaint and the issue of the recommendations by the SPSO, and in fact some of the changes instigated by the University in that time had been informed by lessons learned from that case. We therefore consider that the impact of the SPSO's recommendations was lessened by the length of time taken by them to conclude the case.

Other cases which have gone to the SPSO since the introduction of the Model Complaints Handling Procedure (MCHP) in 2013 have either not been investigated or have not been upheld and there have not been any other recommendations seeking service improvement from the University.

As detailed below, we have seen an improvement in the administration of complaint handling since the introduction of the MCHP. In particular, we are much better able to monitor the implementation of improvements identified through the internal consideration of complaints.

Observations on the general complaint process

Implementation of the Model Complaints Handling Process has had a very significant impact on the University's handling of complaints. Introduction of the procedure necessitated a very significant operation in terms of adopting the policy and delivering training to staff across the institution. The latter covered raising awareness of the new Procedure and training a network of complaints investigators and supporting administrators. The continuing operation of the Complaints Procedure involves significantly more resource than under the previous procedure in force. We recognise that complaints handling is now much more visible and systematic, and internally our investigations have led to many significant recommendations for process enhancement. The mechanism for following through is now more robust.

We recognise the value of these changes as having strengthened the University. However, aspects of the MCHP continue to cause challenge/difficulty particularly in relation to the rigidity of deadlines:

- There are a significant number of complaints that cannot be resolved within five working days, however they do not justify the significant escalation of administration required for a stage 2 investigation.
- The deadline of 20 working days for resolution of complaint investigations (stage 2) is often impracticable. Many of our complaints concern relationships that have been on-going for years and the issues raised are so complicated that unhelpful expectations are raised by reference in the procedure to all but 'exceptional' cases being resolved within 20 working days.

In terms of our dealings with the SPSO, we have found that in the majority of cases we have been satisfied with their findings. Apart from the selected decision report, no other cases from the University, considered under the MCHP, have been upheld by the SPSO. In one case, the SPSO identified some minor deviations from process in the University's handling of the complaint and offered a fast-track resolution of the case whereby the University acknowledged these with the complainant and apologised while the substance of the complaint was not upheld by SPSO. We welcome flexible solutions such as this.

In the case of the selected decision report, the University had concerns with some aspects of the final outcome and a request for a review of the SPSO's conclusions n was submitted. This did not lead to any amendment of the SPSO's report or findings.

I hope this information has been helpful. Please do not hesitate to contact me if you require anything further.

Yours sincerely

Ms Helen Butcher

Assistant Director, Senate Office

Information submitted by the University of Glasgow to SPSO in a letter dated 27 May 2015 detailing the University's response to recommendations in case 201304380 (redacted)

Recommendation: a full review is undertaken of the events that led to the curtailment of Mr C's studies, to identify what could have been done differently and how policies and practices could be improved in the future.

The School of XX have undertaken a review and have provided the following commentary.

> The Undergraduate XX School and the School of XX take the student experience very seriously and are concerned to ensure that all students have the best possible experience whilst adhering to the professional development requirements of the regulator (YY Professional Body).
> We have reflected on the events leading to Mr C's complaint and note the following:

> *Background and Context*

> The events which led to Mr C making his complaint took place 2 to 3 years ago and in the intervening time review and change has taken place in the course of normal business. The time in question was also one during which the leadership of the UG XX School and the School of XX was changing and that has also led to review and progression.
> The bigger picture is that the professional development strand which runs through the undergraduate XX programmes is challenging in terms of delivery and monitoring. This is nationally recognised and it is discussed between the different XX Schools and good practice shared. The YY (Professional body) have a key role in these discussions and have also published guidance on some areas. There are four aspects:
> 1. A professional development strand which runs vertically through the curriculum
> 2. Professional Development monitoring and remediation
> 3. Pastoral care
> 4. Fitness to Practise.
>
> The events involving Mr C relate to elements of 1-3 but not 4.

> The guidance under which the School of XX Progress Committee operates has been changed in a way that now does not allow for a student to be called to a Progress Committee meeting mid-year such as happened to Mr C. A new Chair of the Progress Committee has been appointed and he is further reviewing the regulations and ensuring that committee members undergo training more often and have a detailed knowledge of the context they are operating in specifically in terms of 1 – 3 above as well as the regulatory context.
> Action has already been taken to ensure that members of staff no longer meet with students without a note being taken and the note then forming part of the student record.
> The role of the Degree Programme Head of Welfare is undergoing review with a new appointment just made and the pastoral care of students is evolving into a better defined framework.
> Communication with students regarding progress regulations is being reviewed to ensure it is clear and they are appropriately reminded of the regulations as and when necessary. This will involve, as it progresses, review of the student handbooks and website as well as ensuring that staff are up to speed with all relevant aspects.

The Degree Programme Support Staff are aware that a change is needed in the way in which they communicate with students moving towards a more student friendly approach.

The way in which the Professional Development strand is articulated is being reviewed and the procedures for (2) above are being carefully considered in line with national good practice guidelines. The term "pre fitness to practise" will not be used as it is inappropriate and causes confusion.

Recommendation: The University reviews its policies regarding the provision of support and adjustments for students, and considers consolidating them into one document, to ensure clarity for students and staff in relation to what support is available and how it is implemented.

Having reflected on this matter, the University does not consider that it would be feasible to consolidate all policies regarding support and adjustments for students into a single document, given the wide range of programmes offered by the institution, the types of support and adjustment that can be provided in different contexts, and the different areas of the University with responsibility for different support services. However, we operate in a web based environment and the primary source of information is the website (rather than individual documents). Since the events pertaining to Mr C's complaint many changes have been made, consolidating the availability of information for students. Student Services have, over the past year, updated the 'Information for Current Students' web pages; making information more accessible for all students. Information has been clearly sign-posted under themes such as Health and Wellbeing, Academic Matters, Personal Development & Career. This has ensured that information can be accessed by students (and updated by staff) faster and more efficiently.

The site also highlights the Student Services Enquiry Team who are the 'go to place' for students providing an informative and supportive service, providing frontline advice and assistance as well as directing students to appropriate sources of specialist support.

The web copy has been reformatted, making it more concise and as such easier to read and digest. The information is mobile friendly making it accessible on a range of devices and screen sizes. The web site is also compatible with assistive technology.

Student Services monitors the use of the website, encouraging and welcoming feedback from staff and students. As a result of feedback and ongoing process improvement the information available continues to be updated and enhanced.

The University's Student Support and Development Committee (SSDC) has responsibility for oversight of support provided to students. It is convened by the Clerk of Senate and reports directly to the Council of University Senate. Its remit includes the following: 'To develop relevant policies and codes of practice to support and enhance the experience of the student population.' It also serves as a forum for the University and the Students' Representative Council to work in partnership on these issues. As above, the events leading to Mr C's complaint took place two to three years ago, and we believe that significant work in the area of consolidation of support has taken place in the intervening period. In January 2015 two of Student Services' Strategic themes for 2014-15 presented to SSDC included:

- Student wellbeing/wellness and developing students' resilience as part of a holistic approach to student support, and
- Engagement with Colleges/Schools: Supporting academics in their roles in student Support. This is relevant to the issue raised in Mr C's case where the student may

not qualify for assistance from a specific service (e.g. Disability Service) but may still need support from the relevant academic unit.

Both of these themes reflect the institution's commitment to improving provision of support to students which is accessible and 'joined-up'.

The Senate Office also provides guidance to academic units on the content of Student Handbooks. This guidance brings together a directory of various support services available as well as a list of the various issues that may arise for students.

Recommendation: The University reviews its policies relating to the provision and sharing of sensitive information, to ensure that they clearly indicate why such information is required and who needs to have access to it.

The University Calendar includes a section covering the use of Personal Data (Section 3, Gen.3). This sets out the University's commitment to handling personal data in accordance with the requirements of relevant legislation. However, we recognise the need to set out clearly to students what this means in terms of how information will be shared, and make this accessible to students, i.e. in places that are most frequently accessed in the normal course of their studies.

Students may provide sensitive personal information either to centralised student services or to their own academic units:

1.   Student services

Various support services are available to students. Such services provide clear statements about the way that information provided by students may be used. Two such examples are as follows:

    (i)   The Disability Service.

For each student who applies, the Service conducts a needs assessment. This may lead to a recommendation for adjustments to be made to support the student. In all such cases the student completes a permission form which explicitly authorises the disclosure of information to members of staff and tutors of the University on a need to know basis. It is thus made clear that all staff who will be teaching the student will receive notification of any additional support needs and adjustments, though without unnecessary disclosure of personal information.

    (ii)   The Counselling and Psychological Service

The service has a clearly stated policy on confidentiality, noting that in accordance with the Data Protection Act personal information will only be disclosed to third parties in a limited number of situations, though records held by the Service are accessible to staff of the service. [http://www.gla.ac.uk/services/counselling/contactus/#tabs=2]

2.   Academic staff/units

    (i)   Claims of Good Cause in relation to Incomplete Assessment

Where a student's performance in assessment has been impacted by adverse circumstances (such as ill health) the student may submit information to the academic unit to support a claim of 'Good Cause'. The student is required to give detailed information and supporting documentation relating to the adverse circumstances.

The University is currently piloting an on-line system for the processing of Good Cause claims. This system will provide greater clarity for students on the way that the information

will be shared: on completing an on-line claim students will see text that advises who the information will be shared with (Head of School, Assessment Officer and Course Co-ordinator). The process also offers students the option of submitting supporting information directly to one specified member of staff where he or she does not wish the information to be shared. Claims are then considered by a sub-group of the relevant Exam Board without any need to reveal the identity of the student.

(ii)   Issues impacting on particular requirements of the programme of study
As noted above, Senate Office provides guidance on the content of student handbooks and this is being amended to include a requirement that where students disclose personal information in connection with a request for additional support or adjustment in relation to their studies there will be a clear statement about how that information will be used/shared. Handbooks are made available to students at the beginning of each course and are the main source of day-to-day information throughout the course. Student handbooks are routinely made available on the students' website or the VLE (Moodle) so remain easily accessible throughout.