

Question:

1. The role or responsibility of the Department of Health in directing or coordinating implementation of the MCHP by HSC Trusts;
2. The requirements which the Department communicated to HSC Trusts concerning implementation, including any implementation deadline or commencement date;
3. The role, if any, assigned by the Department to the Strategic Planning and Performance Group (SPPG) in relation to implementation of the MCHP by HSC Trusts; and
4. The arrangements by which the Department obtained assurance or otherwise established whether HSC Trusts had implemented the MCHP.

Response:

Part 3 of the Public Services Ombudsman Act (Northern Ireland) 2016 provides the legislative basis for the Northern Ireland Public Services Ombudsman (NIPSO) to develop and publish Model Complaints Handling Procedures (MCHPs) for public bodies within its jurisdiction, including for Health and Social Care (HSC) organisations in Northern Ireland.

NIPSO published the HSC MCHP on 1 July 2025 and provided HSC organisations with a six-month implementation period prior to its commencement on 1 January 2026. From that commencement date, HSC organisations became statutorily required to operate complaints handling in accordance with the HSC MCHP. There is one NIPSO MCHP for the whole HSC sector supported by separate guidance for family practitioner service providers and commissioned social care providers. This information is publicly available at the following link: [Model Complaints Handling Procedures | NIPSO](#)

Question 1 - the role or responsibility of the Department of Health in directing or coordinating implementation of the MCHP by HSC Trusts

Responsibility for publishing the HSC MCHP and communicating its implementation requirements rests with NIPSO. Responsibility for implementing and operating the HSC MCHP rests with individual HSC organisations.

To support implementation of the HSC MCHP, the Department facilitates a Best Practice Network comprising representatives from HSC organisations, including the six HSC Trusts, together with NIPSO. The Network provides a forum for the sharing of information, learning and best practice in relation to complaints handling. The Department understands that in the Local Government sector, the first sector in Northern Ireland to implement a NIPSO MCHP, a Best Practice Network was also established to support post-launch implementation.

Question 2 - the requirements which the Department communicated to HSC Trusts concerning implementation, including any implementation deadline or commencement date

NIPSO published the HSC MCHP on 1 July 2025 and provided HSC organisations with a six-month implementation period prior to its commencement on 1 January 2026. The implementation timetable and commencement arrangements were established and communicated by NIPSO. As such, implementation requirements have therefore been communicated by NIPSO to HSC Trusts, not by the Department.

Question 3 - the role, if any, assigned by the Department to the Strategic Planning and Performance Group (SPPG) in relation to implementation of the MCHP by HSC Trusts

The role of the Department's Strategic Planning and Performance Group (SPPG) in relation to the HSC MCHP remains consistent with that undertaken by SPPG under the previous HSC Complaints Procedure. This role includes identifying and monitoring themes, trends and areas of concern arising from HSC Trust and Primary Care complaints.

During development of the HSC MCHP, Departmental policy and SPPG representatives participated in the Strategic and Operational working groups established by NIPSO to support development.

Separately, SPPG also led a programme of work to develop a new regional complaints dataset to support the identification, analysis and reporting of trends, risks and areas of concern. As part of these arrangements, HSC Trusts and Primary Care submit their returns to SPPG detailing complaints closed during the previous month. The '*Dataset for the Monitoring of HSC Trust and Primary Care Complaints*' is attached as a PDF.

Although your request did not specifically refer to Primary Care services, SPPG considers the following information with regards to its role relevant and has provided in the interests of transparency.

The Primary Care Directorate within SPPG was responsible for supporting implementation of the MCHP across Primary Care contractor services. Prior to implementation, it developed guidance materials, reporting tools and training resources and shared these with contractors to support implementation of the new procedure. The '*GMS: HSC Complaints Process Guidance Pack*' and the 'Risk Assessment Matrix for Managers' are attached as PDFs.

Within Primary Care, SPPG's Complaints Team may also act as an "Honest Broker" or neutral intermediary during complaints involving Family Practitioner Services where both parties agree.

Question 4 - the arrangements by which the Department obtained assurance or otherwise established whether HSC Trusts had implemented the MCHP

All HSC Trusts have published complaints handling procedures confirming that the MCHP has been implemented, and confirming that arrangements are aligned with the NIPSO *'Health and Social Care Model Complaints Handling Procedure'*. The relevant information can be accessed via the following website links:

Belfast HSC Trust:

Information on complaints | Belfast Health & Social Care Trust website

Northern HSC Trust:

How to make a complaint - Northern Health and Social Care Trust

Southern HSC Trust:

Complaints Procedure | Southern Health & Social Care Trust

South Eastern HSC Trust:

Complaints - South Eastern Health & Social Care Trust

Western HSC Trust:

Compliments, Comments and Complaints | Western Health & Social Care Trust

Northern Ireland Ambulance Service HSC Trust:

Make a Complaint | NIAS

Responsibility for implementation rests with individual HSC organisations, which engage directly with NIPSO regarding their complaints handling procedures. The HSC MCHP states that NIPSO expects organisations to have appropriate self-assessment arrangements in place to assure themselves that their complaints handling procedures operate in accordance with the MCHP. This is in line with the requirement for HSC Trusts to have and maintain necessary clinical and social care governance arrangements, up to and including at corporate Board level, to obtain assurance on organisational compliance with patient safety related policies set by the Department and other relevant bodies, which includes in relation to complaints handling.

The HSC MCHP also provides for NIPSO to monitor organisational compliance through the complaints it investigates and through its liaison with organisations. This includes quality checks of published complaints data and organisational complaints procedures.

As set out in the response to Question 3, the Department's SPPG developed a new regional complaints dataset to support the monitoring, analysis and reporting of complaints by HSC Trusts under the MCHP. HSC Trusts submit complaints information to the Department's SPPG in line with these revised reporting requirements, further demonstrating that HSC MCHP reporting arrangements have been implemented and embedded.

The Department has also established through the work of the Best Practice Network (see Question 1 above) that HSC Trusts have implemented HSC MCHP.

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