

Thursday, 23 February 2023

Report of the Portfolio Holder for Finance, Risk and Customer Services

Comments, Compliments Complaints and Managing Unreasonable Customer Behaviour Policies

Exempt Information

None

Purpose

To seek Cabinet approval for the Compliments, Comments and Complaints and Managing Unreasonable Customer Behaviour Policies.

Recommendations

It is recommended that Cabinet:

1. Approve the Comments, Compliments and Complaints Policy for implementation on 1 April 2023.
2. Approve the Managing Unreasonable Customer Behaviour Policy for implementation on 1 April 2023.

Executive Summary

Comments, Compliments and Complaints Policy

The Comments, Compliments and Complaints policy replaces “Tell Us” which has been in place for several years. It provides an opportunity to move towards a strategic focus on learning from complaints rather than on the number received, so as to support and empower the right culture around complaint handling and more effective resolutions for customers.

The policy has been updated to ensure that it meets the requirements of the Housing Ombudsman and the Local Government and Social Care Ombudsman best practice which have been developed significantly in the past few years. Good practice guidelines issued by the Local Government Social Care Ombudsman (LGSCO) state that periodic reviews of the process should be conducted.

In addition, the Ministry of Housing Communities & Local Government White Paper published in November 2020, sets out clear expectations for landlords in relation to dealing with expressions of dissatisfaction, complaints, including redress and evidence of learning. In 2020, the Housing Ombudsman required all social housing providers to complete and publish a self-assessment of their complaints policy as part of the launch of their new Code of Practice. The Council published an initial assessment in December 2020 with an updated assessment to be published early 2023.

The Complaints process is widely used by customers and provides a vehicle for feedback to be given to the Council and in return, provides a framework in which the Council can respond whilst ensuring the process is subject to effective governance.

The updated policy ensures there is a consistent procedure in place, with defined levels and standards of service.

A dynamic and flexible approach will allow each complaint to be investigated on its own merits, providing the best approach for each complainant.

Through the recording of complaints and expressions of dissatisfaction, trends will be identified, and action taken in order to improve or change services as required.

Website and intranet pages will be updated in line with the new policy and procedures.

Overall, there is no significant change to the process for how to make a complaint, the two stage approach will remain as will the right to escalate a complaint to the Ombudsman where the customer remains dissatisfied.

The key changes in this updated policy are:

- Reduced response times (Service Level Agreements):
 - Stage 1 – 10 working days, reduced from the current 28 days.
 - Stage 2 – 20 working days, reduced from the current 63 days.

During consultation stakeholders have given positive feedback about this change as they felt it will improve the customer experience.

- Complainants will be asked to tell us about their concern within six months of the issue arising. This brings the policy into line with ombudsman guidance.
- Provision of clarity on responsibilities for Council Officers.
- The Information Governance Team become the single point of contact for the facilitation of complaints to improve the customer experience.
- A clarified appeal process for customers to follow in line with Ombudsman guidance.
- Provision of management information reports for service managers and CMT to include service improvements made as a result of resolved complaints.
- Detailed annual report to Cabinet to include.
 - Complaints received, broken down into service areas.
 - How complaints were received (telephone, online form/portal)
 - The Councils LGSCO annual letter.
 - Housing Ombudsman decisions.
 - Any learning identified and actions taken to improve service.
 - 3rd party contractor's complaint performance.
 - Compliments and comments received.

Managing Unreasonable Customer Behaviour Policy

This policy compliments the Compliments, Comments and Complaints policy and it has been reviewed with only minor changes made to update job titles and responsibilities.

Options Considered

N/A

Resource Implications

There are no direct financial implications as a result of this report.

Training on the changes to the policies will be undertaken with all appropriate officers.

Legal/Risk Implications Background

There are no direct legal implications as a result of these policies.

There is a risk that the council will be non-compliant in terms of the Ombudsman Code and guidance on complaint handling should the Comments, Compliments and Complaints policy not be approved.

Equalities Implications

Community Impact Assessments have been undertaken and are attached to the updated policies.

Environment and Sustainability Implications (including climate change)

There are no direct environment or sustainability implications as a result of this report.

Background Information

The Council is committed to providing excellent customer service first time, every time. We realise that sometimes we fall short and where customers are not satisfied then a clear and simple complaints process is required to put this right. We welcome feedback, positive or negative. We want to recognise individuals and teams who have provided excellent service and work hard to improve service where it is not as good as it should be.

The current policy was last reviewed in 2017. The review was required to ensure ombudsman best practice is met, that the council provides the best experience for complainants, takes on board learnings and also recognises complimentary feedback regarding services.

The Council's working environment has become more complex, with some services being provided by third party organisations on its behalf. The complaints policy needs to reflect these new working arrangements as well as best practice in complaints management.

Historic arrangements have resulted in complaints being recorded corporately with Housing complaints being recorded locally within the service area as well as responses being issued directly by relevant service areas. Under the new policy, all complaints are recorded and facilitated centrally within one team, meeting the Housing Ombudsman requirement and the Local Government and Social Care Ombudsman guidance.

Current reporting on complaints is minimal; updating the policy will allow us to determine the scope and timeframe of reporting to provide learning for the service areas and council. Management information reports will be available for service area managers on a regular basis, with an annual complaints report presented to Cabinet.

Report Author

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List of Background Papers

Tell Us Policy

Harassment, Assault and Threat Policy

Appendices

Appendix 1 – Compliments, Comments and Complaints Policy

Appendix 2 – Managing Unreasonable Customer Behaviour Policy

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