

Thursday, 31 August 2023

## Report of the Portfolio Holder for Operations and Finance

### Update on Corporate Comments, Compliments and Complaints

#### Exempt Information

None

#### Purpose

To provide an update to Cabinet following the implementation of the Comments, Compliments and Complaints policy on 1<sup>st</sup> April 2023.

#### Recommendations

It is recommended that Cabinet endorse the contents of this report.

#### Executive Summary

##### Comments, Compliments and Complaints Policy

The Comments, Compliments and Complaints policy was approved by Cabinet on 23<sup>rd</sup> February 2023 and formally implemented on 1<sup>st</sup> April 2023.

The policy provides an opportunity to move towards a strategic focus on learning from complaints rather than on the number received, to support and empower the right culture around complaint handling and more effective resolutions for customers.

As a Council we want to recognise where excellent service has been provided and work hard to improve service where it is not as good as it should be.

The policy ensures there is a consistent procedure in place, with defined levels and standards of service. The 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 dynamic and flexible approach allows each complaint to be investigated on its own merits, providing the best approach for each complainant.

In the new policy there was no significant changes to the process for how to make a complaint, the two-stage approach remained as did the right to escalate a complaint to the Ombudsman where the customer remains dissatisfied.

The Housing Ombudsman has the power to review social landlords' complaints policy to ensure it is compliant with their complaint handling code. In May a review was undertaken on our Comments, Compliments and Complaints Policy and clarifications were requested. The clarifications were centred around the customer experience and the phrasing of some paragraphs within the policy. A review was undertaken, and clarification provided to the ombudsman with minor changes to the wording in the policy being made. The Housing Ombudsman have reviewed our updated policy and have confirmed that it is compliant with their code of practice, the updated policy can be found at appendix 1.

**Complaints Process and Reporting**

The Information Governance Team are responsible for facilitation of the full complaints process, with individual teams providing responses and technical information.

When communication is received from a complainant the team reviews it and determines if it meets the definition of a complaint or if it is a request for service (usually the first time we become aware of an issue). If it is determined a service request or update it is sent to the relevant service area for review and response. The complainant is sent an acknowledgement advising that the communication has been received and has been passed to the relevant service area who will respond directly.

In addition, to enhance the experience for customers the service request process has, since April, been improved. All service requests are now followed up to ensure that customers receive a response.

From April 23 – June 23, 169 service requests/enquiries were recorded and processed.

The service areas with the highest demand of service requests received through the Information Governance team from April – June was:

Service Area	Number of requests received through IFG
Street Scene	34
Housing Repairs	28
Customer Services **	23
Joint Waste	19

\*\* Customer service enquiries may not necessarily relate to the CST service area directly, these requests are enquires facilitated through that team, for example: Logging of enquires from Street Scene\*\*

If a communication is deemed a complaint, it is recorded and assigned to the relevant service area and an acknowledgement (including reference number) is sent to the customer. Reminders are issued to service areas when a complaint response is due and escalated as appropriate.

Complaint recording has been improved with more information now being recorded, which in time will allow trends to be identified and identify actions to improve or change services as required.

A further change to the policy was that a report on comments, compliments and complaints will be provided to Cabinet on a quarterly basis (previously this was an annual report) as part of the corporate performance reporting the first report went to Corporate Scrutiny Committee on 8<sup>th</sup> August 2023 and will be considered by Cabinet on 31<sup>st</sup> August 2023. Appendix 2 gives full details of the first quarter statistics.

Management information reports are provided to service area managers monthly.

**Future Developments**

As a Council we recognise we may not always get it right. The comments, compliments & complaints policy and processes will help;

- Demonstrate learning in annual reports
- Ensure fairness in complaint handling with a resident-focused process
- Provide a universal definition of a complaint
- Create a positive complaint handling culture through continuous learning and improvement

The implementation of the new policy and processes is the baseline point and work will be carried out during the year to establish and improve;

- How data is collected reported to service areas
- The use of customer insight to support informed decision making and service improvements
- How any actions noted as part of a complaint response are processed, followed to completion and reported.
- Identification of trends in complaints made and mechanisms for service improvements as a result of this.
- Using technology to improve processes and reporting
- Communication with residents on service improvements made as a result of feedback

### **Resource Implications**

There are no direct financial implications resulting from this report.

The new more robust approach to complaint handling and monitoring does have additional resource implications, which can be met from current Information Governance budgets.

### **Legal/Risk Implications Background**

There are no direct legal or risk implications as a result of this report.

### **Equalities Implications**

There are no equality implications as a result of this report.

### **Environment and Sustainability Implications (including climate change)**

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

### **Background Information**

Prior to implementation of the new policy in April 2023 the previous (Tell Us) policy had not been reviewed since 2017. A review was required to ensure ombudsman best practice was met, specifically that the council provides the best experience for complainants, takes on board learning and also recognises compliments and feedback regarding services.

The policy meets the requirements of both the Housing Ombudsman and the Local Government and Social Care Ombudsman requirements 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.

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 complaint handling code and the Local Government and Social Care Ombudsman guidance.

The [Ministry of Housing Communities & Local Government White Paper](#) published in November 2020 and more recently the Royal Assent of the [Social Housing \(Regulation\) Act 2023](#) sets out clear expectations for landlords in relation to dealing with expressions of dissatisfaction, including redress and evidence of learning.

The Housing Ombudsman Complaint Handling Code was introduced in July 2020, with a review undertaken a year later. Following the review, the code was updated, and changes took effect from 1st April 2022. The code requires all social housing providers to complete and publish a [self-assessment](#) of their complaint policy and the Council published an initial assessment in December 2020 with an updated assessment published in April 2023 in line with the publication of the new policy.

Landlords must carry out an annual assessment against the Code to ensure their complaint handling remains in line with its requirements and publish the results, in addition Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.

The Housing Ombudsman recently launched their third annual landlord and resident panel survey to gather insight into landlords' complaint handling including how they share learning from complaints, as well as how they are monitoring accessibility. The survey closes on 1<sup>st</sup> September 2023

Website and intranet pages have been updated in line with the new policy and procedures.

### **Key Policy Changes**

The key changes in the updated policy are:

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

During consultation stakeholders gave 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.
  - The Councils LGSCO annual letter.
  - Housing Ombudsman decisions.
  - Any learning identified and actions taken to improve service.
  - 3<sup>rd</sup> party contractor's complaint performance.
  - Compliments and comments received.

### **Report Author**

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### **Appendices**

Appendix 1 – Compliments, Comments and Complaints Policy – updated July 2023

Appendix 2 – Complaints Data Quarter 1 2023-4