

Meeting:	OVERVIEW AND SCRUTINY COMMITTEE
Date:	20 November 2007
Subject:	Adults Services complaints Annual report (social care only)
Key Decision: (Executive-side only)	No
Responsible Officer:	Stuart Dalton, Adults and Children's Complaints Service Manager
Portfolio Holder:	Eric Silver
Exempt:	No
Enclosures:	The report

## SECTION 1 – SUMMARY AND RECOMMENDATIONS

This report sets out the Adults Services complaints Annual report (social care only).

**RECOMMENDATIONS:** None. For Information purposes only.

**REASON:** N/A

## SECTION 2 - REPORT

### ANNUAL REPORT for Adults Community Care Services Complaints for period 2006-07

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## 1. Context

This report provides information about complaints made during the twelve months between 1 April 2006 and 31 March 2007 under the complaints and representations procedures established under the National Health Service and Community Care Act 1990 and through the Local Authority Social Services Complaints (England) Regulations, 2006 and the Council's corporate complaints procedure relating to Adults Community Care Services.

All timescales contained within this report are in working days.

Text in quotation marks indicate direct quotations from the 2006 Regulations or Guidance unless otherwise specified.

### 1.1 What is a Complaint?

"An expression of dissatisfaction or disquiet about the actions, decisions or apparent failings of a local authority's adult's social services provision which requires a response".

### 1.2 Who can make a Complaint?

"A person is eligible to make a complaint where the local authority has a power or a duty to provide, or to secure the provision of, a service for him, and his need or possible need for such a service has (by whatever means) come to the attention of the local authority. This also applies to a person acting on behalf of someone else."

"Where a complaint is received from a representative acting on behalf of a service user, (i.e. his advocate) the authority has the discretion to decide whether or not the person is suitable to act as a representative, in the individual's best interests."

## **2. Stage of the Complaints Procedure and statistics**

The complaints procedure has three stages.

**Stage 1.** This is the most important stage of the complaints procedure. The Department's teams and external contractors providing services on our behalf are expected to resolve as many complaints as possible at this initial point.

The complaints regulations requires complaints at stage 1 to be responded to within 20 working days.

**Stage 2.** This stage is implemented where the complainant is dissatisfied with the findings of Stage 1. Stage 2 is an investigation conducted by an independent external Investigating Officer for all statutory complaints and an internal senior manager for corporate complaints. A senior manager, usually a Group Manager, adjudicates on the findings.

Under the Regulations, the aim is for Stage 2 complaints falling within the social services statutory complaints procedures to be dealt within 25 days, although this can be extended to 65 days if complex.

**Stage 3.** The third stage of the complaints process is the Review Panel under the statutory procedure. Under the corporate complaints process, the Chief Executive reviews the complaint.

Where complainants wish to proceed with complaints about statutory social services functions, the Council is required to establish a complaints Review Panel. The panel makes recommendations to the Director who then makes a decision on the complaint and any action to be taken. Complaints Review Panels are made up of two independent panellists and one Councillor. There are various timescales relating to stage 3 complaints. These include:

- setting up the Panel within 30 days;
- producing the Panel's report within a further 5 days; and
- producing the local authority's response within 15 days.

A further option for complainants is the Local Government Ombudsman (LGO) who is empowered to investigate where it appears that a Council's own investigations have not resolved the complaint. Complainants can refer their complaint to the LGO at any time, although the Ombudsman normally refers the complaint back to the Council if it has not been considered under our procedure first.

## **3. Summary of Activity**

The Complaints Service recorded 131 complaints manually [only 68 on the corporate log] complaints during the year, compared with 76 manually [86 on the corporate log] the year before. Please note the Complaints Service took over central logging of complaints in September 2006 because we recognised the level of complaints not being captured on the corporate log.

Total complaints made:

Between 1 April 2006 and 31 March 2007 we received and closed 118 Stage 1 complaints.

Of these, 10 [being 4 statutory + 6 corporate] progressed to Stage 2.

Of those 10 Stage 2 complaints, 2 corporate proceeded to Stage 3 [0 statutory].

### **3.1 Comparison with the preceding year**

This indicates a 40% increase in Stage 1 complaints from last year within the Department.

This should be viewed as a significant success and improvement in the Council's complaints management. The reasons for an increase include introducing central logging of complaints and delivering mandatory training to all managers on what is a complaint, budget reductions and greater promotion of the right to complain so we are now capturing a more real picture of the number of complaints.

Key message: Council's that capture high levels of Stage 1 complaints invariably achieve high Star ratings as it demonstrates a willingness to hear concerns, address them and improve services as a result of them. Whereas Council's that capture lower levels of Stage 1 complaints tend to get lower star ratings. [Source: Jerry White, Local Government Ombudsman & Steve Carney, Head of Complaints, CSCI 2007]

### **3.2 Outcomes of Stage 1 complaints**

Please note the new database does not capture this information. The Complaints Service is negotiating with BTP to introduce this on the new database.

This is a significant drawback because this information helps managers identify trends. Therefore, as of April 2007, the Complaints Service has started to manually record outcomes for the next annual report.

### **3.3 Response times**

This information is not available for 2006-07 but will be reportable under the new complaints database (which became operational in February 2007) for future annual reports.

Anecdotally, response times have significantly improved over the last two years. Few complaints run seriously over time (over a month late) in comparison to previously. However, there is still work to be done to improve response times.

### **3.4 Key improvements**

Within 2006-07 the Complaints Service has made the following changes to improve complaints management:

- The Complaints Service centrally logging all complaints and sending acknowledgements and leaflets to complainants (50% increase in complaints captured in the second half of the year after centrally logging was introduced);
- A new database was introduced (though it does not capture all the information that the Council is statutorily required to capture under the complaints regulations);
- The Complaints Service now vets all complaints response letters to improve to quality and ensure the right to proceed to the next stage is included in the letter;
- Mandatory complaints training for all managers;

- A complaints surgery was piloted at Pinner Road (Children's Services) which has proved successful in helping staff manage complaints better and will be extended to other service areas
- New leaflets have been introduced;
- The complaints sections of the Harrow website have been significantly improved, including downloadable complaints leaflets;
- The Complaints Service now acts as the point of contact for complainants so senior managers do not become embroiled in complaints and thus compromise their position to adjudicate if complaints escalate.

#### **4. Focus for the near future:**

- Learning from complaints
- Training for staff and members (if welcomed)
- Raising awareness of the complaints process
- Improved and more regular reporting
- Improved timescale adherence. The next annual report will provide response times for complaints
- Better support for staff involved in complaints
- Improving management of the independent complaint investigators pool
- Improving complaints monitoring and management within Partnership and contracted services

## 5 Stage 1 Complaints

(Percentages rounded up/down:)

table 1

Community Care Service	Older People		Physical Disability		Learning Disability		Mental Health		Contracted Services		Emergency Duty Team		Finance		MOW, HART, Sheltered Housing, Consultations & other		Total
Number of complaints as per manual recording	no	%	no	%	no	%	no	%	no	%	no	%	no	%	no	%	no
	<b>38</b>	32	<b>29</b>	24.5	<b>20</b>	17	<b>13</b>	11	<b>9</b>	8			<b>3</b>	2.5	<b>6</b>	5	<b>118</b>
Corp log	<b>26</b>	38	<b>20</b>	29	<b>10</b>	15			<b>7</b>	10					<b>5</b>	7	<b>68</b>

**Analysis:** All areas showed lower corporate recording than the Complaints Service were capturing manually. No Mental Health complaints were put onto the corporate log. Central logging by the Complaints Service should remove these discrepancies from future reports. The Complaints Manager is currently discussing with his counter-part in CNWL how the Council is informed about mental health complaints and mental health clients are informed of their right to complain to the Council about any of our statutory functions.

**Nature of complaint: as per corporate log**

**(Percentages rounded up/down:)**

Community Care Service	Older People		Physical Disability		Learning Disability		Contracted Services		MOW, HART, Sheltered Housing, Consultations		Total	
	no	%	no	%	no	%	no	%	no	%	no	%
Level & quality of service	7	10	2	3	1	1.5	7	10	2	3	19	28
Attitude of staff	2	3	2	3	1	1.5			2	3	7	10
Policy & procedural requirements not met												
Action/lack of action	15	22	13	19	8	12					36	53
Service Delay	1	1.5	2	3	1	1.5					4	6
Failure to provide information	1	1.5	1	1.5							2	3
Other Reason												
<b>Total</b>	<b>26</b>	<b>38</b>	<b>20</b>	<b>29</b>	<b>11</b>	<b>16</b>	<b>7</b>	<b>10</b>	<b>4</b>	<b>6</b>	<b>68</b>	

**Analysis:** Older People's, PDSS and HLDT complaints constitute 57 out of 68 logged complaints. For PDSS and HLDT the Action or lack of action was the overwhelming reason for complaint whilst for Older People 7 of the 26 complaints were about the level or quality of service. All 7 Contracted Services complaints were about the level or quality of service.

Interestingly, no complaints were made about policy and procedural requirements not being met. (Children's Services 17% of complaints were about this).

53% of complaints relate to the action or lack of action does not greatly help identify where work needs to be done (Children's Services figure is only 31% in comparison).

The following new categories have therefore been introduced for the new database and will hopefully offer more insight into the types of complaints each team is receiving.

• <i>Failure to follow policy or procedure</i>	• <i>Refusal to provide service</i>
• <i>Loss or damage to property</i>	• <i>Change to individual's service – withdrawal</i>
• <i>Quality of facilities</i>	• <i>Delay failure in taking action</i>
• <i>Allocation/Reallocation</i>	• <i>Level of service</i>
• <i>Breach of confidentiality</i>	• <i>Quality of service delivery</i>
• <i>Discrimination by an individual</i>	• <i>Policy/legal/financial decision</i>
• <i>Discrimination by a service</i>	• <i>Freedom of Information</i>
• <i>Staff conduct Attitude/Behaviour</i>	• <i>Hate &amp; race crime</i>
• <i>Comms – Failure to keep informed</i>	

**Complaint made by:**

<b>Community Care Services – person making the complaint as recorded manually</b>	<b>Of 118</b>
Service User	<b>32</b>
Relative (often informal carer)	<b>58</b>
Advocate –(instigated by either carer or service user)	<b>13</b>
Solicitors	<b>3</b>
Friend, Councillor, other	<b>12</b>

This is the first annual report to examine who is making a complaint and it highlights some interesting points. Given the frailties of many Service Users it is not surprising a significant proportion of complaints are made by other 'representatives' of the Service User. However, that only 27% of complaints come directly from the Service User, seems quite low. This may indicate more work is needed to raise awareness of the complaints process as well as empowering service users to feel they can complain needs to be done.

The new regulations indicate that consent can no longer be implied. This has meant instances where 'representatives' of a service user have not pursued the complaint further, either because they do not want to obtain consent from the Service User or the Service User refuses to give consent.

The Complaints Service is actively trying to increase the use of advocates where complaints are made. 13 out of 118 is not high enough given the expertise of an advocate is one of the most effective tools of empowering a Service User to resolve a complaint quickly and fairly.



## 6 Equalities Information – Service Users (corporate log)

### Gender of Service User (as per corporate log)

Male	21
Female	45
Not recorded	2

### Ethnic Origin of Service User

White/British	37
Black Caribbean	2
Black other	1
Asian other	11
Irish	2
Indian	1
Mixed Asian	1
Not recorded	13

**Analysis:** The level of complaints relating to service users from Black and Indian backgrounds seems low. The Complaints Service is devising an Equalities Service Plan to try to increase access to the complaints process for all service users.

### Disability (including mental health services involvement) as per corporate log

No. where service user has a disability	47
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## 7. STAGE 2 COMPLAINTS

There were 10 Stage 2 complaints, 4 statutory & 6 corporate.

3 statutory complaints were upheld 1 was partially upheld, 0 were not upheld and 0 were withdrawn by the complainant.

2 corporate complaints were upheld, 1 was partially upheld, 3 were not upheld and 0 were withdrawn by the complainant.

The 4 Stage 2 statutory complaints involved investigations undertaken by external independent investigating officers.

6 of the complaints came under the Harrow corporate complaints procedure with internal managers investigating.

### Stage 2 complaints

Service	Older Peoples	Physical Disability	Mental Health	Learning Disability	Contracted Services	TOTAL
Number (Statutory)	2		1	1		4
Number Corporate	3		1	2		6
% escalating to Stage 2	13%		15%	15%		
% upheld (fully or partially)	40%		100%	66%		

**Analysis:** Of the 29 PDSS Stage 1 complaints, not one went to Stage 2 which given the budgetary situation was a remarkable achievement that should be recognised.

**Key message:** The best indicators as to how well a team are managing complaints are the percentage of complaints that escalate from Stage 1 to Stage 2, whether Stage 2 complaints are upheld or not and what learning is identified from complaints.

This is the first time the percentage of complaints upheld has been examined and it will be interesting to see if so many complaints are upheld next year. As a rough indicator you would hope that no more than 10% of complaints escalate from Stage 1 to Stage 2.

### Response Times (statutory):

Service	Older Peoples	Physical Disability	Mental Health	Learning Disability	Contracted Services	TOTAL
Within 25 days	1					1
Within 65 days	1		1	1		3
Over timescale						
Withdrawn						

The mean average time to produce a final response at Stage 2 (including the adjudication) was 35.5 days.

Of the 4 statutory complaints that were considered, 1 was dealt with in the required time period. None exceeded the maximum timelimit of 65 working days. The other three took 34, 34, and 51 days respectively. The complaint that took 51 days was due to the illness of the investigating officer and lack of access to files due to an office move.

All local authorities recognise that the 25 day timescale is extremely tight and the Council uses independent investigators which by their nature take longer than an internal investigator. The advantage of a complainant trusting an independent investigators findings and thus very few complaints proceeding to Stage 3 outweighs the negative of longer timescales. In all cases the Complaints Service advised the complainant on the progress of the investigation.

Equally, the Complaints Service endeavours to ensure the speediest response possible whilst achieving a fair and thorough investigation. Therefore the Complaints Service paid for training for the core group of independent investigators in March 2007, where one of the key messages was how important timescales are.

**Stage 2 Outcomes:**

	Older Peoples	Physical Disability	Mental Health	Learning Disability	Contracted Services	TOTAL
Stat Upheld	1		1	1		3
Corp Upheld	1		1			2
Stat Partially Upheld						
Corp Partially Upheld				1		1
Stat Not Upheld	1					1
Corporate Not Upheld	2			1		3
Stat Withdrawn						
Corporate Withdrawn						

**Analysis:** That half of all Stage 2 complaints were fully upheld indicates that more training for teams to respond at Stage 1 may be beneficial. 5 out of 10 were fully upheld indicates Stage 1 responses may need to improve.

Comparison with Children's Services complaints: In only 25% of Children's Services complaints was the primary point of complaint upheld.

**Nature of Complaint:**

	OPS	HLDT	Mental Health
Lack of correct information	1		
Non-provision of requested Service			1
Level of service			
Quality of service		1	
Service Delay			
Withdrawal, reduction or change in service	1		
Failure to communicate	1		
Failure to carry out other required action	1	1	
Behaviour of staff		1	
Financial	1		
Council action			1
<b>Total</b>	<b>5</b>	<b>3</b>	<b>2</b>

**Analysis:** Whilst not the primary point of complaint, one trend in HLDT complaints was the delay in action being taken.

Two Stage 2's complained about POVA action being taken. 1 upheld the complaint, the other did not.

3 complaints were about changes to placements which may be a reflection of the recent emphasis on savings.

## 8. STAGE 3 COMPLAINTS

There were 0 review panels held this year [the same as 05-06 and a notable success]. There were, however, two Stage 3 corporate complaints this year.

### 8.1 Stage 3 complaints by Service Area, Timescales and Outcome.

Status	Service Unit HLDT, OPS & MH	Setting up Panel (30 day timescale)	Panel report produced (5 day timescale)	Council Response (15 day timescale)	Outcome
Statutory	0				
Corporate	2 1 OPS 1 HLDT (HAPS)	N/A	N/A	N/A	1 partially upheld, one not upheld

**Analysis:** The HLDT/HAPS case was partially upheld and was the result of an incorrect decision a number of years ago which placed the Council in an ultra vires position. Legal Services advised the Council that corrective action was necessary and compensation paid to the complainant.

## 9. Ombudsman complaints and enquiries.

During the year, 2 corporate complaints were considered by the Local Government Ombudsman. The conclusions reached by the Ombudsman are detailed below.

### 9.1 Complaints made to the Ombudsman and Decision

Service Area	Total	Outcome of Ombudsman Consideration	
		Ombudsman Discretion – no or insufficient injustice	Premature Complaint
Older People’s	1	Local resolution - £50 compensation (rejected by complainant)	
Learning Disability (HAPS)	1	Rejected as falling outside the Ombudsman’s jurisdiction	

**Analysis:** The Older People’s complaint involved numerous issues. The Ombudsman only found one point of fault on any of these issues on the part of the Council.

## 10. Percentage escalation

The following table indicates how many complaints have escalated from Stage 1 to Stage 2 and how many have progressed from Stage 2 to Stage 3. By measuring these figures as a percentage we can gauge customer satisfaction with our responses to their complaints.

*(last year’s percentages in brackets)*

	<b>Service Area:</b>
Stage 1 to Stage 2	8.5 % (6.6% last year)
Stage 2 to Stage 3	20% (0% last year)

**Analysis:** As a council, our target percentage is 10% or less. It is suggested that independent investigation in conjunction with mediation would have made it far less likely that either of the Stage 3 complaints cases would have progressed to the Ombudsman given no complaints have progressed to the Stage 3/ Ombudsman in the last two years where independent investigators and mediation has been used. Independent investigations are only currently used for

statutory and not corporate complaints. The offer of mediation was not taken up by management in the Older Peoples case and the family live abroad in the HLDT/HAPS case which meant mediation was not an option. However mediation is better established and understood now and operational managers seem more willing to try mediation in light of the success it has had.

The small numbers of complaints managed at Stage 3 and Ombudsman make broad conclusions difficult but the fact both Stage 3 complaints were corporate complaints and both progressed to the Ombudsman may indicate that the corporate complaints process is not nearly as effective at resolving complaints in comparison to the statutory process.

**Key message:** Harrow maintains an excellent record for resolving social care complaints. The Ombudsman has not investigated a social care complaint in the last two years.

## 11. Compensation Payments

The Ombudsman said at a conference in May 2007, that the single biggest failing of the social care complaints procedure is that compensation is not addressed or considered where it should be.

The Council provides compensation if after a complaint has been investigated or as part of an Ombudsman's investigation, it is concluded that:

- the Ombudsman would find that there has been maladministration by the Council causing injustice to the complainant; and
- he would recommend that compensation should therefore be paid to the complainant.

Payments related to the following service areas.

<b>Service</b>	<b>Stage</b>	<b>Amount</b>
Sheltered Housing	1	78.99
OPS	2	1,560
HLDT	3	2,000
	<b>Total</b>	<b>£ 3,683.99</b>

## 12. Mediation and Alternative Dispute Resolution

The DoH consultation document on the proposed amalgamation of the NHS and social care complaints procedures entitled 'Making experiences count' states, "Our proposals place more emphasis on people being able to talk to the people responsible for delivering and/or commissioning the services involved. We believe that there should be every opportunity given to resolve things through discussion and negotiation rather than by using a set procedure."

Harrow Council is already delivering pioneering work in this field. The success of internal mediation noted in the previous annual report at resolving complaints and thus preventing complaint escalation continues. The use of

mediation has grown with staff/managers who were initially sceptical or reluctant now requesting mediation themselves. The number of mediations has increased threefold this financial year. Mediation was successful in 15 out of 20 social care cases. To put this in context, the vast majority of Councils have not used mediation once in the last year.

### **13. Advocacy**

Advocacy for adults is not a statutory requirement, but is good complaint practice and is available to all service users and carers through Council funding to local voluntary groups representing all client groups. The DoH consultation states, "We believe... advocacy support should be a statutory right." The DoH are also proposing the introduction of the equivalent of PALS and ICAS in social care as well. A public information leaflet detailing local advocacy services is available and is routinely sent to complainants with their acknowledgement letter.

### **14 Complaints dealt with by the local authority and NHS Bodies**

Please note that there were no joint investigations during this financial year.

### **15 Learning Lessons/Practice Improvements**

The DoH consultation states organisations will be expected to achieve "a demonstrable change in the quality of services as a direct result of what people tell organisations through their complaints."

This is one of the key areas where we need to improve as a Council. The Council is also introducing an extension to the complaints database in 2007 that will allow us to capture and report on agreed actions/learning outcomes from complaints with a named lead and timescale for implementation.

Complaints provide senior managers with useful information in respect of the way that services are delivered. The consideration of complaints has resulted in changes to procedures as follows:

<b>Older Peoples Services</b>
<ul style="list-style-type: none"><li>• Written responses will be made to written queries re finding suitable residential care.</li><li>• The Older Peoples handbook to be updated and amended. <u>This has not taken place as yet.</u></li><li>• Verbal agreements between agencies are not sufficient – contracts should be mandatory.</li><li>• Access to clients should be arranged in advance with homes and their clients.</li></ul>

## **Harrow Learning Disability Team**

- The transition protocol to be reviewed
- A Panel protocol will be drawn up
- Telephone skills training for staff
- A generic supervision protocol will be introduced
- Carers assessments need always be considered and be offered
- Case load weighting to be explored
- Transfer of case management as soon as a service user moves abroad

## **Mental Health Services**

- Comprehensive assessments should be documented & lead to written care plans
- Individual budgets are being considered to improve procedures for service users with 'dual diagnosis'
- Harrow to examine compliance with National Services Framework for Mental Health re needs assessments & care plans including meeting performance targets for reviews.
- Monitoring & reviewing of SLAs between the Council & the Mental Health Trust
- A new protocol on managing Court of Protection cases incorporating an evidence sheet template.
- An authorisation form introduced for Court of Protection applications
- Training for HLDT staff on Court of Protection procedures

## **16. Record of compliments**

Examples of compliments received were:

Older People's Services: 'I write in praise of one of your care managers..... She has been most helpful to my wife and me and it seems as though nothing is too much trouble for her ..... It cannot be easy to deal with people who are, by the very nature of their job, not always feeling at their best but she does it in her own caring manner.....'

'.....My illness necessitated giving up my flat....this entailed negotiations which were time-consuming which ..... handled with unfailing patience and good humour.....for which she has my grateful thanks.....'

Physical Disabilities & Sensory Services: 'I thank you and your manager for kindness and understanding.....'

'Ms ..... is one of those individuals who should be proud.... and has demonstrated a very mature, responsible and professional attitude.....my



father was impressed with her professionalism and wishes to express his gratitude....’

‘thank you for being so helpful and understanding....your suggestions will....enable me to live a better life’

‘thank you so much for...getting respite for M.... in order that I am able to get away on holiday and have a true rest.....’

‘Just would like to say a BIG THANK YOU for allocating a temporary OT to me.....She was very nice and very supportive and very understanding about me. I am very very happy with your work’.

## 17. Summary of consultation

Below is a summary of the key points from Department of Health’s complaints consultation ‘Making experiences count’ proposing new complaint regulations in 2009:

- “A **single, comprehensive complaints process** across health and social care” to be introduced i.e. You can complain to one organisation about a number of NHS and social care organisations and expect that organisation to co-ordinate one response from the different organisations.
- **Keeping both existing Ombudsmen** separate (Health Service Ombudsman and Local Government Ombudsman).
- Introducing a **PALS** equivalent in social care (PALS and ICAS defined on P.30 “Making experiences count”). The Council will fund PALS, the Department of Health the ICAS equivalent
- **Advocacy** support to be a statutory right (like ICAS in the NHS).
- Suggests the current procedure is too process-driven. Proposes a more **outcome-focused procedure** with more flexibility/options tailored to the individual complaint and needs of the complainant. “There should be every opportunity given to resolve things through discussion and negotiation rather than by using a set procedure.”
- A **one-stage complaints process** (currently 3 Stages) before going to the Ombudsman but with more flexibility on how to manage the Stage 1 complaint depending on whether it is simple or complex.
- A **new single regulator**.
- “**Legal accountability on the most senior managers** to ensure complaints arrangements meet people’s needs and that services are improved as a result of what people have told them.”
- **Commissioners will be required to collate complaint information from providers** about the level, nature and resolution of complaints by contractors. How providers respond to complaints should then routinely be used when making commissioning decisions.
- Core standards for complaint handling. It is proposed that there will be overall targets in respect of **performance management** and targets for concluding cases.

- Particular emphasis will be placed on monitoring **lessons learnt** feed into continuous improvement of the quality of services.

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**Stuart Dalton**

*Complaints Manager, Adults and Housing    Date: 17 August 2007*

**Financial Implications**

None

**Performance Issues**

No PAF or BVPI indicators. However, complaints has a significant impact on the customer satisfaction KPI.

**SECTION 3 - STATUTORY OFFICER CLEARANCE**

Name: Bharat Patel	<input type="checkbox"/>	on behalf of the* Chief Financial Officer
Date: 18/09/07		
Name: Sharon Clarke	<input type="checkbox"/>	on behalf of the* Monitoring Officer
Date: 11/09/07		

**SECTION 4 - CONTACT DETAILS AND BACKGROUND PAPERS**

**Contact:** STUART DALTON, PEOPLE FIRST COMPLAINTS SERVICE  
MANAGER (020 8424 1578)

**Background Papers:** NONE

**IF APPROPRIATE, does the report include the following considerations?**

1.	Consultation	YES/ <u>NO</u>
2.	Corporate Priorities	<u>YES</u> / NO