

Meeting:	Cabinet
Date:	13 November 2008
Subject:	Council Customer Service Standards, Council Complaints & Access to Service Review
Key Decision:	Yes
Responsible Officer:	Carol Cutler Director BTP & Customer Services
Portfolio Holder:	Councillor Paul Osborn Portfolio Holder Performance, Communication and Corporate Services
Exempt:	No
Enclosures:	A – Summary of overall Customer Services Improvement Plan B – Council Customer Service Standards C – Council Complaints and Compliments Policy

## Section 1 – Summary and Recommendations

This report sets out the overall programme of work for improving customer service within the council as a whole. In particular, attention will be drawn to the new Council Customer Service Standards and the Council Complaints and Compliments Policy. It also briefly discusses some of the work being done to understand our customers to help improve service delivery.

### **Recommendations:**

That Cabinet note and endorse the content of this report. In particular:

- Adopt the new Council customer service standards
- Adopt the new Council complaints and compliments policy
- Note the summary customer service improvement plan

### **Reason: (For recommendation)**

The comprehensive customer service improvement plan responds to the Access to Services Inspection. The council's performance and satisfaction levels will be greatly improved once the outputs of the plan are implemented

and embedded across the council.  
Failure to implement may result in consistently low council ratings.

## Section 2 – Report

### Introduction

The Audit Commission conducted an Access to Services Inspection earlier this year. The review concluded that Harrow Council ‘...provides fair ‘access to services’ with uncertain ‘prospects’ for improvement.’ In response to the inspection, there has been activity within the council to address the issues raised and plan how the recommendations would be considered and implemented.

A Director of Business Transformation and Customer Service was appointed with the responsibility of transforming the Council's interaction with its customers and to drive the implementation of an appropriate action plan to improve access to services.

The current Access Strategy was reviewed and developed further with our partners Capita. The Strategy describes how the Council offers its customers and citizens access to services and how it wants to do this in the future. Building on this, a three year Customer Services Improvement Plan has also been implemented containing a number of quick wins and longer-term improvements that the overall access strategy supports. Negotiations are underway to finalise the timescales within the plan, as consideration must be given to the impacts that the outcomes of the plan will have on the rest of the organisation and the way we deliver services. See appendix A for a summary of the Customer Services Plan.

Also, a Customer Service Working Group has been established with representatives from across the council. The role of the group is to provide a forum to share information and expertise and to ensure coordination of customer service activities both internally and externally.

### The Customer Services Programme Plan – Quick Wins

#### ***1. Implement a set of Council customer service standards***

One of the key recommendations to come out of the Access to Services Inspection is that the Council should:

- Develop and implement a set of Council standards for all forms of customer contact:
  - ensure customers are consulted on the content of the standards when they are in development;
  - ensure that the agreed standards are widely publicised; and
  - monitor against the standards regularly and ensure that results are shared with customers.

The expected benefits of this recommendation are:

- Clear and comprehensive standards which are understood by customers.

- Staff are clear about what is expected of them.
- Consistent standards for all customer contacts.

The Council service standards that were adopted by the council back in 2002 were reviewed and benchmarked against other London councils. It was found that the standards were not being consistently applied and did not reflect the progress we had made in terms of call centre technology, or use of email and web forms as means of communication.

A set of new standards were put together and were extensively consulted on with our residents and staff. After taking on board a number of suggestions the final standards were compiled and agreed by CSB in September 2008. See appendix B for the full standards.

The top ten standards are set out below and arranged in the three areas that our residents said were important to them:

We will deal with your enquiry **quickly**:

- Your call will be answered within five rings or thirty seconds. If you leave a voicemail message, we will ring you back within one working day.
- When you send us an email, we will acknowledge that we have received it within twenty-four hours and let you know that we are dealing with your request.
- We will make sure that we send a reply to your email within five working days.
- If you visit us, we will make sure we see you within fifteen minutes of your arrival.

We will give you a **quality** service:

- We will always be friendly, polite and helpful when dealing with your enquiry.
- We will explain things to you in plain English, without using council jargon.
- We will make sure that our offices are maintained to a high standard, so that you come into a nice environment when visiting us.

We will help to **solve your problem**

- We aim to give you the information you need the first time that you contact us.
- If your enquiry is complex and it will take longer to deal with your request, we will let you know how long it will take to give you the answer.
- If you wish to give us positive feedback or if you didn't experience this level of service, please let us know. You can either call the relevant department or fill in a form online at [www.harrow.gov.uk/comments](http://www.harrow.gov.uk/comments)

We intend to carry out further consultation on an annual basis to review the standards to ensure that they are meeting the needs of our customers.

The standards were officially launched during National Customer Care Week (6<sup>th</sup> –10<sup>th</sup> October 2008), which successfully raised awareness of customer care and the new standards to staff and our customers. It also included a number of activities that staff at all levels were able to participate in. The top

ten standards have also been published in the October edition of Harrow People. The next stage of this project is to embed the standards through a comprehensive training programme for all members of staff.

## **2. Introduce mystery shopping**

Mystery shopping has also been progressed as a quick win in response to the following recommendation highlighted in the Access to Services inspection report:

- Improve access to services and customer experience by:
  - analysing data and performance information for access to services outside Access Harrow and using this to inform service developments;
  - developing a Council approach to measuring the performance of access to services.

Through mystery shopping and analysis of the results, we will increase our understanding of the effectiveness of our customer services. Where surveys indicate levels of customer satisfaction with Council services, mystery shopping will help the Council understand why customers are/are not satisfied with Council services and drive improvement in levels of customer satisfaction.

The first tranche of mystery shopping took place week beginning the 20<sup>th</sup> October 2008 and the final results of this exercise will be available at the end of November 2008.

## **3. Knowing more about our customers (Customer Insight – Experian)**

This particular project will give the council a greater understanding of our customers and communities in order to serve them more efficiently and effectively while balancing our own internal priorities and imperatives.

The project meets the following Access to Services recommendation:

- Improve access to services and customer experience by:
  - Developing a strategic approach to access covering all services in consultation with customers and key partners.
- Develop a coordinated approach to knowledge management both within the Council and with partners that ensures:
  - Knowledge both within the Council and with partners informs the strategic approach to access to services.

The project will identify a set of bespoke customer segments for Harrow by household and then match them to service use, potential service use and other relevant data identified by the Council. (i.e. MORI survey, library usage, etc). Segmenting our customers in this way will provide the council with:

- Deeper understanding of the people of Harrow.
- Knowledge about the different methods used to deliver services (internet, face to face, telephone, etc) and opportunities to encourage use of different methods

- Knowledge about how many people by segment exists in Harrow and their location and ethnic composition.

There are significant benefits in terms of efficiencies and improved service that can be drawn from this project. Across the Council the following high-level benefits can be derived:

- Improved evidence based policy formulation
- Citizen focused services
- Customer experience improved
- Customer satisfaction increased
- Cost efficiencies gained as resource more accurately deployed and targeted
- Alignment with central government policy

The Council will be working with Experian to deliver this project. Work is already underway to collate the relevant information and data that the council currently maintains. This data will be matched and analysed during November and the beginning of December. The final results from this analysis should be available by mid January 2009. At that point, the Council can use the information to think about how we transform service delivery now and in the future.

#### ***4. Improving the Council's Council complaints and compliments policy and procedure***

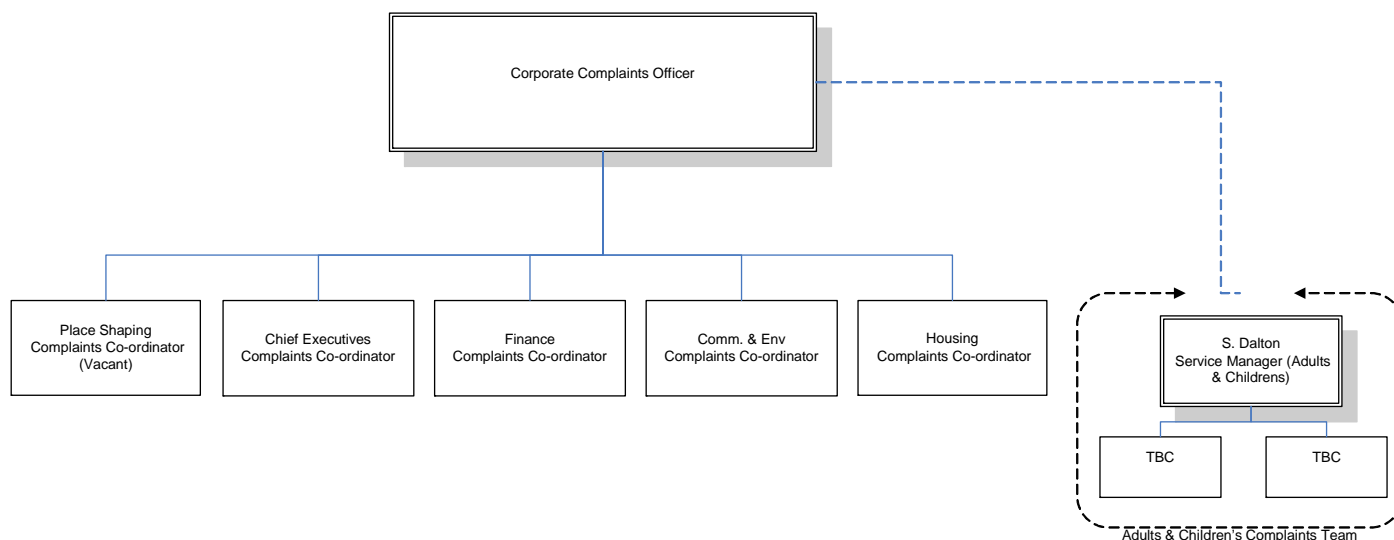
The current management of complaints within the Council is inconsistent with a mixture of service areas using the existing I.T. system (SAP/CRM) and the use of a variety of local recording and management processes using spreadsheets. This results in inconsistent and unreliable performance information, not in keeping with comparative Councils in terms of volumes of complaints and levels of customer satisfaction. This view has been confirmed by a number of internal and external audits, the Access to Services Inspection, and by the Ombudsman.

Therefore this project is aimed at meeting the following Access to Services recommendation:

- Improve the management of complaints Councillily by:
  - ensuring that complaints are dealt with in a timely and positive way;
  - analysing issues and trends in complaints data; and
  - systematically using the outcome from complaints to improve service delivery and performance

A Council complaints and compliments policy for Harrow Council has been produced, consulted on and agreed by Council Strategic Board in September 2008. The policy closely follows the guidelines issued by the Ombudsman on running a complaints system and advice has been sought from other high performing London boroughs that are reporting a high number of complaints received and resolved in the first instance. The policy is attached as appendix C.

The organisational model for implementing this policy is outlined below.



Recruitment of a Council Complaints Officer is underway as it is hoped to have someone in post by January 2009. The co-ordinator posts will be filled by the Directorates concerned using existing roles. Enhancements to the I.T. system (SAP/CRM) operating system for logging and monitoring complaints will be complete by January 2009.

### Equalities impact

An Equalities Impact Assessment has been completed for both the service standards and the complaints and compliments policy. Where issues have been identified, an action plan has been drawn up to manage them. This action plan is reviewed on a six monthly basis.

### Financial Implications

The overall customer service improvement plan will have revenue growth implications which will be considered as part of the budget setting process for 2009/10.

### Performance Issues

The CSWG will work in conjunction with the Director of Business Transformation and Customer Services to ensure that a rigorous performance management framework is in place to measure the outputs of the key projects mentioned above.

Key measures will include:

- Flagship action 5.2 – Improve access to services through our contact centre
- 
- National Indicator (NI) 14 – avoidable contact
- Place Survey which includes:
  - NI 5 satisfaction with local area
  - NI 4 influence on decisions affecting local area
  - NI 139 older people able to access service and support they need
  - NI 140 being treated with respect and consideration by public services
  - And various other questions like Q6/8/11 perception of public services/specific council services/overall satisfaction with Council; Q10 value for money; Q12/28 \*feeling well informed,

specific & general; Q30 perception of services getting better or worse

\*Evidence from MORI is that there is a direct correlation between people who feel well informed by the Council and those who are satisfied.

The National Indicators and Place Survey outputs will be used in the organisational assessment of the Council and the area assessment of public services in general in the Borough under Comprehensive Area Assessment. Successful implementation of these proposals will have a positive impact on the above indicators and consequently the likely assessment of the Council and its partners.

A programme of mystery shopping will continue to support measuring the customer service standards and complaints will continue to use the existing Business Warehouse (BW) process to compile reports which will feed into Council Improvement Boards and CSB performance meetings.

### **Risk Management Implications**

The risks of failure to deliver these key projects are being managed with the appropriate risk logs and project documentation.

Failure to successfully complete and implement the projects will result in the council continuing to show low scores in customer satisfaction and inspection ratings.

### **Section 3 - Statutory Officer Clearance**

Name:.....Sheela Thakrar	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: ...24/10/08.....		
Name: ...Hugh Peart	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: .....4/11/08		

### **Section 4 – Performance Officer Clearance**

Name:.....Tom Whiting .....	<input checked="" type="checkbox"/>	On behalf of Divisional Director (Strategy and Improvement)
Date: .....24/10/08		

## **Section 5 - Contact Details and Background Papers**

Contact: Kireen Rooney, x5360

Background Papers - None



## Appendix A – Summary of Customer Services Improvement Plan

Ref	Programme Stream	Current Position	Year End Position
1	<b>Review Access Strategy</b>	<p>The Access Strategy was developed at the start of the BTP with Capita in October 2004. It has been largely implemented, except for a key decision on removing additional access points outside of Access Harrow.</p> <p>A review, and resulting new strategy, will carry forward any outstanding deliverables, add in work arising from a number of external audits, and most significantly drive forward our strategy and plans to complete Access Harrow, roll-out access service standards outside of this environment, and increase the levels of resolution of customers' issues. These elements are already included in this wider plan which form the basis of this report, but the Access Strategy will give in addition the context for our detailed plans and show their key relationships.</p>	New Access Strategy in place and driving the overall programme
2	<b>Complete Access Harrow</b>	<p>Access Harrow has in Council a significant volume of customer contact. At present it is planned to in Council Planning and Building Control, including its reception service into Access Harrow following its expansion in November 2008. There remain important areas of the Council outside its scope, particularly in Adults and Children's services. This plan looks to review remaining services and agree their inclusion within Access Harrow and the transfer of resources from service areas to support meeting Council access service standards.</p>	Access Harrow is expanded to physical full capacity and Planning and Building Control services are introduced. The first phase of the continued roll out is introduced and planning underway for all further stages.
3	<b>Develop Customer Insight</b>	<p>The Council currently has little if any joined up information around the make-up of our customers for any of our services. Also, we do not methodically look at our processes from the customers perspective, known as 'customer journey mapping'.</p>	The technology is developed with early results being used to influence the access strategy and wider council approaches and strategies.

Ref	Programme Stream	Current Position	Year End Position
4	<b>Accreditation</b>	<p>The Council's Customer Services are not generally accredited (although there are some exceptions such as Revenues and Benefits who have Charter Mark). The Varney recommendation is to achieve CSE (Customer Service Excellence) status that has replaced the Charter Mark accreditation. Customer Service Excellence (CSE) is the UK Government's national standard for excellence in customer service.</p>	<p>Access Harrow has gained accreditation and is recognised as a high performing contact centre. The expertise gained in the process will be fed into the wider accreditation for the whole Council in 2009/10.</p>
5	<b>Channel Migration</b>	<p>Following implementation of the new website on 24 July 2007 and the launch of the channel migration campaign in February 2008, there has been an significant increase in the use of the website for transacting with the Council (from 325 forms per month prior the launch of the new website, to 751 forms per month for the 6 months since the launch of the channel migration campaign).</p> <p>However, we still lag behind other markets and there is still massive potential in expanding the use of the web across Council services. A particular barrier is our inability to authenticate the identity of customers making it difficult to transact all but the most mundane services completely electronically.</p>	<p>The Website will be high performing and easy to use. A number of improvements to its look and functionality will have been implemented. A number of new portals will be in place and will Drive up use of the web in line with our channel migration strategy.</p>
6	<b>Develop Service Standards</b>	<p>Council customer service standards were first introduced in Harrow in 2002, following the cross cutting 'First Contact' best value review. Although these were agreed at that time, they have since fallen out of general use. This point was picked up by inspectors during the recent 'Access to Services' review.</p> <p>The Council has no Council service standards and no consistent approach to developing service specific standards. Across the Council the approach to monitoring service delivery varies with some areas having robust methodologies and others not.</p>	<p>Service standards are agreed and published and have begun to be measured in a consistent and accurate manner.</p>

Ref	Programme Stream	Current Position	Year End Position
7	<b>Improve Resolution</b>	According to recent research carried out with the residents of Harrow, the single most important factor when contacting the Council is 'resolution'. Solving issues and enquiries at the first point of call, along with driving out the 'failure demand' from our services, will not only increase our customer satisfaction ratings but also improve our efficiency.	The measured performance of resolution has increased (measured by external survey) due to increased training in Access Harrow and the completion of an action plan.
8	<b>Improve Complaints Handling</b>	The current management of complaints within the Council is inconsistent. There is no Council policy and no common method of recording and reporting them. Consequently, we cannot use them as a tool to identify ways to improve service. This is compounded by a lack of clarity around who is responsible for dealing with complaints. Our complaint handling has therefore been criticised by the Ombudsman and in the Audit Commission's Access to Services Inspection. It requires urgent action.	The new complaints system is rolled out with high levels of compliance. Reporting is possible at all levels and CSB are able to develop strategies to tackle poor service provision. The Ombudsman recognises our improved complaints management approach.
9	<b>Capturing and Learning from Customer Feedback</b>	The Council currently has little if any joined up information around the make-up of our customers for any of our services. Also, we do not look at any of our processes from the customers prospective.	Regular measurement of customer services and channel performance underway with results used to develop better understanding of customer experience in using channels and services.
10	<b>Improve Consultation</b>	Our current consultation activities take place with very little coordination and no clear Council guidelines. Consultation can give us, and our partners', business intelligence about our diverse communities; help to tailor services to meet specific needs; and help to improve levels of satisfaction. With this approach in mind, it is crucial to ensure that there is a joined-up co-ordinated approach to consultation at the Council and with our partners and that consultation methods and channels are robust.	The Council will have a Council wide consultation process and will use technology to capture and deploy all consultation activity.
11	<b>Improve Training</b>	There is no Council approach on Customer Service training in place. High levels of training were completed as a part of the establishment of Access Harrow and continue as part of performance management and where new services are integrated in the One Stop Shop and Contact Centre. The development of a Council wide approach will involve consideration of how it will integrate with the MDP and first line training, and consideration of how it will be funded.	Customer service training will have been piloted and a plan developed to integrate it into the Council's wider approach on management and front line training.

Ref	Programme Stream	Current Position	Year End Position
12	<b>Review Numbering Strategy</b>	There are currently over thirty different telephone numbers directed across the Council which is confusing for customers. As a result many calls are unnecessarily made to the switchboard and other parts of the Council where customers are then transferred. The numbering strategy will enable customers to find the correct telephone number with ease and thus improve resolution at the first point of contact.	The Council will have agreed a strategy for the number of telephone numbers, and will have started to reduce and combine numbers
13	<b>Review Access Points</b>	The Council has a single One Stop Shop (OSS) at the civic centre. This has limited capacity and the design has been restricted by the available space. There are a number of other single service access points that are badly designed, not welcoming and in some instances do not meet DDA requirements. They also have little or no technology to enable us to record customer contacts. There are a number of new access points such as the Children's Centres and Neighbourhood Resource Centres that could provide access to other targeted services. Libraries also have the potential to do more.	The Council will have agreed its strategy for access points across the borough and will have started to integrate them into the technology and branding of Access Harrow.
14	<b>Understand VFM Issues</b>	Other than in Access Harrow there is little information about the transaction costs of each customer contact. VFM for access to services across the whole Council has not been evaluated as assess to services is not explicitly reviewed. Little benchmarking information is available so we have limited knowledge as to how our costs compare. In addition, we do not have a methodology for tracking the overall impact of changes in both the volume and type of transaction due to changes in demand and channel migration. As a result of the above we lack the basic information needed to intelligently drive down costs.	

## Appendix B – Council Customer Service Standards

### Customer Service Standards

#### Why do we need standards?

We have standards in place to tell you what level of service you can expect from us. It also tells you what we expect from you and what to do if things go wrong.

We want to give you the best service possible and these standards will help us to deliver a high level of service across the council as a whole.

#### Our commitment to you:

- We will deal with your enquiry quickly
- We will give you an excellent service
- We will work with you to sort out your problem

If you need to contact us then please be reassured that we are committed to the following principles:

- Being open and responsive to the needs of the diverse communities we serve
- Providing a choice of ways to access the services that people want and need
- Consult with our customers, learn from their views and obtain feedback after implementation
- Investing in our staff so they are equipped to serve you better

#### When you CALL us:

- We will answer the telephone within **5 rings** or **30 seconds**
- We will ring you back within **1 working day** if you leave a voicemail message or if we promise to ring you back

#### When you WRITE to us:

- We will acknowledge your **email or web form within 24 hours** of receipt and **reply within 5 working days**  
*(If the matter is complex, and your email cannot be answered within 5 working days, we will inform you of how long it will take for us to answer)*
- We will **reply to your letter or fax within 10 working days** of receipt  
*(If the matter is complex, and your letter or fax cannot be answered within 10 working days, we will inform you of how long it will take for us to answer)*
- We will avoid jargon, and do our best to explain things clearly

#### When you VISIT us:

- We will see you within **15 minutes of your arrival** at any of the council's reception points  
*(if this is not possible, we will explain why and let you know how long it will be until someone can see you)*
- If you have made an appointment, we will see you within **5 minutes of the appointment time**  
*(if this is not possible, we will explain why and let you know how long it will be until someone can see you)*
- We will give you at least **24 hours** notice if we need to change the time of the appointment

**If we need to VISIT you:**

- We will carry clear documentation that identifies us as a council employee or contractor
- We will arrive within **15 minutes** of any pre-arranged appointment
- We will let you know within **24 hours** if we need to change the time of the visit or will be late

**When you REQUEST A SERVICE from us:**

We will deal with it in accordance with the **published service standards** for that particular service. These standards are available on the councils website.

**If you COMPLIMENT or COMPLAIN to us:**

We will deal with your complaint or compliment in accordance with the council's Council complaints and compliments policy. A leaflet can be obtained via the council main reception and further information can be obtained on the council website.

**If you need our HELP:**

If you have a visual or hearing impairment, physical or learning disability or if English is not your first language, we will do our utmost to accommodate your needs by making arrangements to:

- Provide letters, notices and leaflets in easily understandable formats, large print, on audio cassette, or in Braille
- Provide a translation service when you telephone us or have an appointment to visit us
- Provide a textphone service, signers or an induction loop
- Comply with DDA standards at council reception points wherever possible

**How you can help:**

In order to ensure that we are meeting the above standards and providing you with quality customer services, you can help us by:

- Telling us if we have exceeded your expectations or have not delivered a service to your satisfaction
- Letting us know if you no longer require a service, or wish to cancel an appointment we have previously made for you
- Informing us of any changes to circumstances such as address, status and contact numbers
- Treating our staff with courtesy and politeness

## **Appendix C – Council Complaints & Compliments Policy**

### **Introduction**

Harrow council welcomes feedback about its services and recognises the right of all its customers to complain, compliment or make a suggestion about any council service or activity. Such feedback provides us with valuable information on our performance and assists in our continuing bid to be recognised as one of London's top performing councils.

This policy details the councils overarching policy on dealing with complaints and compliments received from our customers. The policy is supported by good practice guidance for staff together with detailed customer information and publicity materials.

### **Aim and Objectives**

To provide an accessible means to all our customers who wish to express either satisfaction or dissatisfaction with a service they have received.

To provide a fair, consistent and structured process for resolving complaints in a courteous and efficient manner.

To enable customers to complain with the assistance of a representative or advocate if required.

To record all complaints and compliments to help us analyse customer feedback and inform future service planning and delivery.

To obtain records of complaints and compliments made so that regular reviews can be produced for internal performance monitoring and public accountability.

### **Ensuring equal access for all**

We are committed to equal opportunities and our aim is to make our complaints and compliments policy easy to use and accessible to all of our customers. It will be widely publicised and available in a variety of formats. We will ensure that customer information is available upon request in Braille, large print, community languages, or audiotape.

### **Who can make a complaint or compliment?**

Anyone dissatisfied or satisfied with the service, actions or lack of action from Harrow Council – or someone acting on their behalf and with their permission – can use this procedure.

## **When can a complaint or compliment be made?**

Compliments can be made at any time, however with complaints it is far easier to find out what happened and to put things right if they are received at the time. As time passes it becomes more difficult to investigate events fairly and fully – people’s memories fade, staff who were involved may have left the council, or records may no longer be available.

For these reasons, the council will normally only accept complaints made within **six months** of the incident or circumstances that lead to the complaint. However, if there are exceptional circumstances (illness, changes in personal circumstances, etc) provided by the complainant for the delay in submitting the complaint, the relevant Divisional Director and Council Complaints Officer may make a discretionary decision to consider the complaint providing the circumstances are evidenced.

If the council receives a complaint and decides not to accept it on the above grounds the customer should be told why.

## **How to make a complaint or compliment**

Anyone who wishes to make a complaint or compliment may do so either:

- in person
- by telephone
- in writing (by letter, fax, email, using the councils complaint form which is also available online)

In normal circumstances a complaint or compliment should be made to the actual service which is subject of the complaint or compliment.

Any member of staff will be able to accept a complaint or compliment.

## **Support and advocacy**

Many people feel daunted at the prospect of making a complaint. They may be unsure about how to go about it, or how best to put their case. The council has a positive approach to complaints and will encourage people to seek the support of friends or other advocates such as Citizens Advice Bureau. The council will assist people in finding such support.

The council will, where appropriate, accept complaints from advocates or third parties, provided that the person affected has given their written consent. In some cases, for example children or vulnerable people, if it seems that the person may be unable to give their consent, the Council Complaints Officer will make a judgement as to whether it is appropriate to accept the complaint from an unconfirmed representative.



## **Anonymous complaints**

In normal circumstances the council is unlikely to be able to effectively deal with an anonymous complaint or compliment under the Council complaints and compliments policy, as the council needs to correspond with and in some cases meet with the complainant in order to address their concerns. Therefore a judgement will need to be made on a case-by-case basis whether to look into the substance of a complaint made anonymously.

## **Unreasonable and unreasonably persistent complainants**

The council is committed to dealing with all complaints fairly and impartially and to providing a high quality service to those who make them. As part of this service there is not normally a limit on the contact complainants have with the council. However, there may be complainants who, because of the frequency of their contact with the council, hinder its consideration of their and other people's complaints. Such complainants may be referred to as "unreasonable and unreasonably persistent complainants". The complaints may become persistent, vexatious or repetitive. The complainant may, despite having had an original complaint investigated and been notified of the outcome, not accept that the matter is concluded. The complainant will have exhausted the internal complaints procedure. Exceptionally therefore it may be necessary to take action to limit or terminate their contact with the council.

In consultation with the Director of Legal & Governance service, the Director of Customer Services and the Council Complaints Officer shall be authorised to identify a complainant as "unreasonable or unreasonably persistent" under the terms of this policy.

Before applying this policy the Director of Customer Services and Council Complaints Officer shall:

- Ensure that the complainant has exhausted the internal complaints procedure
- Ensure that the complainant has been reminded of his/her right to refer the complaint to another body e.g.
  - The Local Government Ombudsman
  - The Standards Board for England
  - The Information Commissioner
  - The Council's External Auditor
  - The Secretary of State (if the complainant considers the council has failed to meet its statutory duty).
- Ensure that the complainant has been reminded of his/her right to obtain independent professional advice.

The Director of Customer Services and the Council Complaints Officer shall determine any restrictions which shall be imposed in respect of a complainant deemed to be "unreasonable or unreasonably persistent". Any restrictions imposed will be appropriate and will normally follow a prior warning to the complainant. The options most likely to be considered are:

- Requesting contact in a particular form (for example, letters only)
- Requiring contact to take place with a named officer
- Restricting telephone calls to specified days and times
- Terminating further communication

In all cases where it is decided to treat someone as an unreasonable or unreasonably persistent complainant, the council will write to tell the complainant why his or her behaviour falls into that category and what action is being taken as above.

## **Complaints involving more than one service**

In the event that a complaint involves more than one service, a lead department will be nominated based upon the main focus of content of the complaint to co-ordinate a single response. This decision should be made by the Council Complaints Officer in conjunction with the relevant Divisional Director.

## **Complaints about our contractors**

We require any organisation that provides services on our behalf to comply with the policy. This means we require our contractors to record and respond to customer feedback, provide us with information when requested and assist us with complaint investigations as appropriate.

## **Complaints about Councillors**

Complaints about the conduct of Councillors are outside the scope of this procedure and are dealt with by the Standards Committee of the Council.

Anyone can complain about a Councillor breaching any part of the Code of Conduct for Councillors. A copy of the Standards Committee's guidance on how to make a complaint and complaint form are available from the main reception one stop shop and on the Council's website.

## **Councillor, GLA Member and Member of Parliament (MP) Enquiries**

Members of the Council, the GLA Member for Brent and Harrow and Members of Parliament make enquiries of the council about a range of matters raised with them by constituents. The general purpose of these enquiries is to obtain information in order to respond to a constituent.

If the constituent wishes to make a complaint about the delivery of a service, the Member (i.e. Councillor or GLA) or MP can refer the matter to be dealt with under this policy. This will avoid the Member or MP acting as an intermediary and enables them to represent their constituent if they feel this is appropriate. If the matter is not within the remit of this policy and there is a statutory or other appeal process available, the Member or MP will be advised promptly to ensure that the constituent does not miss the opportunity of exercising a statutory right by using an inappropriate complaint channel.

The Council aims to respond to Members' and MPs' enquiries within **10 working days** of receipt. Where the matter is urgent, the response time will be reduced as appropriate.

## **Complaints about staff**

If a complaint regarding staff actions or behaviour is found to be valid, then the issue will be referred to the appropriate Human Resource Procedure such as the disciplinary procedure and investigated and resolved in accordance with those requirements.

## What is a compliment or suggestion?

This policy defines a 'compliment' as:

"A customer giving us feedback about how well we delivered a service or how helpful an employee has been".

We will log details locally within service areas and thank the customer for taking an interest in our services and for taking the time to let us know we are providing a good service.

The Divisional Director or appropriate manager will acknowledge excellent service with individual employees.

This policy defines a 'suggestion' as:

"A customer giving us feedback on how we can improve any council service".

We will log details of the suggestion locally and the relevant service manager will consider the suggestion and send a response to the customer within **10 working days**. This response will include a thank you to the customer for taking the time out to be involved and help us to improve council services and provide an explanation on how we will implement their suggestion or explain why we are unable to.

The Council Complaints Officer will collate and monitor compliments and suggestions and will ensure that this information is regularly published on the council's intranet site.

## What is a complaint?

This policy defines a 'complaint' as:

*“An expression of dissatisfaction by one or more members of the public about the council’s action or lack of action or about the standard of a service”.*

This applies to whether the action was taken or the service provided by the council itself or a person or body acting on behalf of the council.

There can be confusion between what constitutes a complaint and what represents a request for a service. For the purpose of this policy a request for a service is defined as reporting a fault or problem or requesting information. The request only becomes a complaint if the customer chooses to contact the council again to point out that the service has not been delivered and would therefore, like it treated as a complaint.

Examples of service requests:

- Libraries: “You haven’t got the book I want”. This is not a complaint, this is a service request for the book to be procured for use by the customer.
- Refuse: “my bin has been missed today”. A service request can resolve the problem, but the customer should be asked if they want to make a complaint based on the councils failure to deliver a service.

With this in mind, where a customer has submitted a complaint which the council deems to be a request for service, it is important that this is clarified to the customer from the outset.

## Scope of policy

Complaints will generally include allegations about:

- Failure to provide a service at the level or standard laid down by council policy or published service standards
- Unhelpful or insensitive attitude of an employee or agent of the council
- Neglect or delay in answering a query or responding to a request for a service
- Failure to follow the council’s agreed policies and/or procedures
- Failure to take account of relevant matters in coming to a decision

The following types of complaint are *excluded* from this policy:

- Complaints which amount to a disagreement with the council, about its decisions rather than the way in which the decision has been made
- A planning or development control matter where a right of objection exists, unless the complaint is about the way the matter has been dealt with
- A council decision using regulatory powers, for example licences or certain environmental functions, or when the decision is governed by other regulations such as benefit assessments, rent reviews and lease renewals or Council Tax recovery unless the complaint is about how the matter has been dealt with
- A complaint that is, or could reasonably be expected to be the subject of legal proceedings

This complaints and compliments policy will not cover:

- Requests for a service
- An explanation of council policy
- Matters for which there is an existing right of appeal, with a separate procedure, such as an appeal within the council or to an independent tribunal, or other legal remedy
- Complaints about the alleged breaches of council's Code of Conduct for Members

This policy should be read in conjunction with the council's other relevant policies, including (but not exclusively) those relating to Harassment and Racist Incident Reporting and Customer Service Standards.

# The complaints process

## Stage 1

Where possible, complaints will be dealt with quickly and informally.

- A record of the complaint will be made on the council's complaints system (SAP/CRM) and acknowledged within **3 working days**. The acknowledgement will detail the allocated reference number for the complaint, a brief summary of the complaint as the council understands it, the date the complainant should expect a full response and contact details of the sender.
- In the event that a full response can be made within the 3 working days, an acknowledgement need not be sent.
- The complaint will be fully responded to within **10 working days**. It will advise the complainant of their right to move to Stage 2 if they are not satisfied with the outcome of the service's initial investigations.
- The time period of 10 days to respond fully maybe extended where additional information is required from the complainant to clarify the issues.
- The complainant will be advised that they have 28 days from the date of the full response letter in which to request a further review of their complaint.

If the complaint cannot be resolved within the timescale for this stage, the complainant will be advised that further enquiries will be carried out and a response made as soon as possible and within a maximum of 20 working days of receipt of the complaint. If the complaint cannot be resolved within 20 working days, the complainant will be informed of the reasons in writing and the complainant will be offered the opportunity to progress to Stage 2.

## Stage 2

The purpose of Stage 2 is to formally investigate the concern or complaint, consider the findings and make a decision about the outcome. Where appropriate some complaints may be referred directly to stage 2:

- When the person complaining is not satisfied with our efforts to resolve the complaint at Stage 1
- When the complainant wishes – and the appropriate Head of Service/Divisional Director agrees – to start proceedings at the formal investigation stage
- When a Head of Service/Divisional Director judges the complaint sufficiently serious to warrant immediate investigation at Stage 2.

A request for a Stage 2 investigation should be made in writing to the Corporate Complaints Officer. On receipt the Corporate Complaints Officer will:

- Acknowledge the complaint within **3 working days**. The acknowledgement will detail the allocated reference number for the complaint, a brief summary of the complaint as the council understands it, the date the complainant should expect a full response, contact details of the sender and provide information explaining the formal complaints procedure.

- Forward the complaint to the investigating officer (an appropriate service manager responsible for the service being complained about and selected in liaison with the appropriate Head of Service/Divisional Director) for investigation.
- Inform the complainant of the name and contact details of the investigating officer.

A written reply will be provided to the complainant as soon as possible within **20 working days** of receipt of the complaint as a Stage 2 complaint. The response will fully address the issues raised (and any proposed remedy) or explain the reasons for any delay.

If a full response is not possible within the 20 working day deadline, the complainant should be sent a progress report within this timescale informing them of the delay, the reasons for this and an anticipated response date.

The complainant will be advised that if they are still not satisfied with the response following the formal investigation, they can request (within 28 days of the response being sent to them) a final review of their complaint at Stage 3.

### **Stage 3**

If the complainant continues to be dissatisfied following Stage 2, the complaint can be reviewed by the appropriate Corporate Director for the final time.

Exceptionally, it may be decided that there is nothing more that can be said or done after the Stage 2 response and the relevant Corporate Director may then decline to look at the matter.

Should the relevant Corporate Director decide to pursue with the review of the complaint, the request will be:

- Acknowledged within **3 working days** and will give the name of the Corporate Complaints Officer who will be assisting in the review.
- The relevant Corporate Director, as a result of his/her review, will provide a full written reply within **20 working days** of receipt of the request for a review at Stage 3.

### **Stage 4**

If the customer is still not satisfied after progressing through all three stages of this process, the customer has the right to complain to the Local Government Ombudsman if they feel that the council has not resolved their complaint satisfactorily.

A copy of the Ombudsman's complaint leaflet, which includes a complaint form, is available from main reception at the Civic Centre.

Correspondence from the Ombudsman is addressed to the Chief Executive and the Corporate Complaints Officer acts as the link officer for these complaints.

Although the council complaints policy covers the whole organisation, the law says that certain types of complaints have to be handled differently from others. For this reason, the council complaints and compliments policy is made up of the following separate procedures:

- Complaints and Compliments Procedure
- Adults & Children's Social Care Complaints Procedure

When complaints are received, they may trigger other Council procedures, for instance the Racial Incident Reporting Procedure.

## **Remedies**

Where the complaint is upheld or upheld in part, the remedy needs to be appropriate to the complaint. The Local Government Ombudsman offers the general principle for guidance that "as far as possible the complainant should be put in the position he or she would have been in if things had not gone wrong".

Remedies may include:

- An apology
- An explanation:
  - as to what went wrong
  - of policy/procedures
  - of the way in which the council has handled the matter
- Remedial action - such as providing the service desired
- A commitment to review procedures to avoid the same thing happening again
- Financial compensation and clear instructions about anything the complainant needs to do

The complaints investigator, in consultation with their Head of Service/Corporate Directors, who have upheld a complaint, shall be responsible for determining the appropriate remedy. If the complainant has suffered loss or suffering, financial compensation may be appropriate. Where they feel that financial compensation is appropriate they should refer to the Corporate Complaints Officer and the Director of Customer Services.



## **Rights, Roles and Responsibilities**

Our customers have the right:

- To have a friend or other representative help them with their complaint
- To confidentiality (if an investigation cannot proceed without the complainant being identified, the complainant will be given the option whether or not to continue)
- To be kept informed of the progress of their complaints
- To receive an apology if a complaint is upheld
- To be informed of any changes to Council policy or procedures arising from a complaint

This complaints and compliments policy does not affect the right of an individual or organisation to approach a local councillor or Member of Parliament for advice or assistance. If this results in a complaint being made by or on behalf of an individual, it will be dealt with using this procedure.

Our staff has the right:

- To be treated with respect and courtesy at all times by both customers and managers
- To have the support of a friend, Trade Union or other representative if they are the subject of a complaint
- To be made aware of and have the support of, the council's Violence at Work policy and procedure

The responsibilities for the resolution of complaints are set out for officers under the appropriate stage headings. At the informal stage the receiving officer should attempt to resolve the complaint, or if this is not possible, refer the matter to an appropriate officer to action.

### **Corporate Complaints Officer**

- Co-ordinate complaints across the council
- Ensure compliance to the process and standards
- Provide quality assurance
- To be the central co-ordinator for all Stage 2 complaints in consultation with the relevant Divisional Director for that complaint (excluding Adults & Children's services)
- Liaise with the Legal Department on Ombudsman complaints
- Coordinate Council reports for Council Strategic Board performance mornings, and Overview and Scrutiny.
- Ensure there is learning from the way complaints are managed across the council.

### **Department Complaints Co-ordinator**

- Acknowledge receipt of the complaint (Stage 1) and informing the complainant that an investigation will be carried out
- Ensure details of all complaints received by the Service are recorded on the complaints system
- Ensure the progress of complaints is monitored and responses are sent within timescale
- Update the complaints system when an investigation is complete
- Provide quarterly reports to relevant improvement boards

### **Investigating Officer (Service Manager)**

- Provide the complainant with information about the complaints process
- Ensure that the complaint is investigated objectively
- Keep the complainant informed of progress of the investigation
- Provide the final response to the complainant within the appropriate timescale for a Stage 2 complaint
- Inform the Council Complaints Officer when the complaint is closed and providing a copy of the final response.

### **Head of Service/Divisional Director**

- Adherence to the council's complaints and compliments policy and guidelines by staff and providing advice where necessary
- Oversee the handling of complaints by their staff at Stage 2
- Ensure that, where possible, frontline staff within their service are supported to resolve complaints
- On receipt of compliments ensure that appropriate staff receive a copy of the correspondence

### **Corporate Directors**

- Adherence to the council's council complaints and compliments policy guidelines by their department
- Consider complaints monitoring information in the planning and improvement of services
- Implementation of specific procedures, if actions by complainants are deemed to be unacceptable.

## **Performance and monitoring of complaints**

The council is committed to continually improving the services we deliver to our customers. Information gained from complaints can be a valuable tool in identifying the needs of our customers and developing our services to meet those needs.

The Corporate Complaints Officer has the overall responsibility for monitoring and reporting performance in complaints handling and resolution by collating such statistical information and reporting it to the council's performance and finance scrutiny committee, Council improvement boards and the Chief Executive and Corporate Directors on a quarterly basis.

The complaints system contains a reporting facility that enables data to be analysed to identify any trends in specific service or geographical areas or complaint subject.

## **Equalities monitoring**

The council is committed to equal opportunities and tackling all forms of discrimination. To assist the council identify areas where there may be discrimination in service provision. We will undertake periodic equality monitoring to assess whether there are any equalities issues underpinning the issues raised by complainants.

## **Review and Evaluation**

In order to ensure we continue to provide the best possible complaints handling service for our customers, this policy will be subject to ongoing evaluation and annual review by the Director for Customer Services and Corporate Complaints Officer.

## **Retention of records**

All records relating to complaints and Ombudsman complaints will be kept for a period of 7 years.