

STROUD DISTRICT COUNCIL
AUDIT AND STANDARDS COMMITTEE
TUESDAY, 18 APRIL 2023

Report Title	Revised Complaints & Feedback Policy			
Purpose of Report	To consider the revised Complaints & Feedback Policy			
Decision(s)	The Committee RECOMMENDS to Council: (a) To adopt the revised Complaints & Feedback Policy; and (b) Delegate authority to the Strategic Director of Resources to approve minor changes to the policy.			
Consultation and Feedback	<ul style="list-style-type: none"> • Corporate Policy & Governance Team • Community Access & Engagement Manager • Strategic Leadership Team • Leadership & Management Team • Social Housing Services • Involved Tenants Group • Equality, Diversity and Inclusion Working Group • All Group Leaders 			
Report Author	Owen Chandler, Information Governance Officer Email: owen.chandler@stroud.gov.uk			
Options	None			
Background Papers	Housing Ombudsman’s Complaint handling code April 2022 Local Government & Social Care Ombudsman’s ‘Effective complaint handling for local authorities’ May 2022			
Appendices	Appendix A: 2023 Complaints & Feedback Policy v2.5 Appendix B: 2019 Corporate Complaints Policy & Procedure Appendix C: Equality Analysis Form Appendix D: 2023 Complaints Process Flowchart			
Implications (further details at the end of the report)	Financial	Legal	Equality	Environmental
	No	Yes	Yes	No

1. INTRODUCTION

1.1 In 2019 the current ‘Corporate Complaints Policy & Procedure’ document [Appendix B] was put into operational use. This policy was designed for feedback received from external stakeholders such as customers, service users and Council social housing tenants. The revised policy continues to follow this designation. While this is predominantly an operational policy, as one of our key customer facing documents it is important that members are aware of this review and confirm their support for the revised policy.

- 1.2 Since the introduction of the 2019 policy there have been changes to officer roles and general updates to complaints best practice which needed to be reflected in the operational policy.

This review also provided the opportunity to ensure that as a key customer facing document the Complaints & Feedback policy reflects our organisational Values and Behaviours and Council service standards. This updated One Council policy provides a useful reference document for all stakeholders and facilitates a consistent level of service across the whole Council.

2. KEY CHANGES

- 2.1 Although the principles of the complaints & feedback policy remain unchanged, it has been updated to reflect current best practice of the Local Government and Social Care Ombudsman and Housing Ombudsman.
- 2.2 The revised complaints & feedback policy has been widely consulted throughout the authority with key stakeholders. The main changes are detailed below.
- 2.3 **Policy name changed from 'Corporate Complaints Policy & Procedure' to 'Complaints & Feedback Policy'**. This change has been made to reflect that we are interested in all feedback and removing 'corporate' makes it clearer that the policy is for our customers and not just an internal document.
- 2.4 **Standardised response times to stage 2 complaints.** All stage 2 complaints now have up to 20 working days to send a final response. This homogenises the time to respond across all complaints leading to a consistent service and a predictable experience for complainants. For reference, Housing and Information Governance complaints already had 20 working days to respond, this change brings our other complaints in line with these. We are still well within the local government ombudsman's recommendation that local authorities should be allowed "up to 12 weeks for a full response to the complaint".
- 2.5 **Introduced a peer-review for stage 2 complaints.** We know that when a complaint is made, our customers expect a fair and thorough investigation. While we're confident this has always been the case, we wanted to evidence this as part of our stage 2 process. As such, any stage 2 complaint responses will be reviewed by a senior officer from a service area not related to the complaint. This peer-review will check that the responses are clearly written and that any arguments or findings are fair and accurate. The senior officer carrying out the peer review has the authority to request the originating service amend the complaint response if it fails any of these tests.
- 2.6 **Delegation to Strategic Director of Resources** - We have added in a final section to delegate authority to the Strategic Director of Resources to approve minor changes such as improved analysis of all complaints and the reporting of low-level complaints which do not reach the stage 1 threshold. These changes will help us better understand the needs of our customers and deploy resources to the areas that matter the most to our communities.

3. NEXT STEPS

- 3.1 **Technology Improvements.** We are in a period of significant technological improvement through the 'fit for the future' programme, and we want to improve our policies and procedures as new technologies and systems are developed. This revised policy allows us to work towards controlled improvements to reporting and analysis as part of the programme.

3.2 Unacceptable Behaviour Policy. Given its relevance to the Complaints & Feedback policy, a separate review is being undertaken of our suite of policies related to unacceptable behaviour. This will assess our existing policies to ensure they reflect the increasing prevalence of digital unacceptable behaviour and collate them into a single document where applicable. The policies affected are: unacceptable behaviour by complainants, violence and aggression towards staff, personal security register, and lone working.

4. IMPLICATIONS

4.1 Financial Implications

No financial implications are anticipated from this new policy.

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4.2 Legal Implications

Compliance with the Housing Ombudsman's Complaint Handling Code ("the Code") forms part of the membership obligations set out in the Housing Ombudsman Scheme.

The Code seeks to be prescriptive only where the Ombudsman believes clear and consistent practice by all landlords is essential. The Ombudsman recognises that each landlord will need to adapt its complaints policy and processes to meet the needs of its residents. Consequently, there are some areas where a landlord can use its discretion, either for all residents or on a case-by-case basis, to achieve best practice in complaint handling.

Landlords will be asked to self-assess against the Code annually on a 'comply or explain' basis and publish this on their website. Non-compliance could result in the Ombudsman issuing complaint handling failure orders.

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4.3 Equality Implications

An EIA has been carried out by Officers in relation to the decision made in this report, attached at appendix C, and no equality implications arise.

4.4 Environmental Implications

There are no significant implications within this category.