

Complaint Handling Procedure

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London Borough of Southwark Complaint Handling Procedure

Introduction

This document

This procedure document is intended to provide the reader with a comprehensive understanding of complaint handling at London Borough of Southwark (LBS). This includes the council's end-to-end complaint-handling process, the use and functionality of the ICasework IT systems used for all complaint management, and the key complaint-handling roles which ensure that every complaint is managed effectively and promptly resolved wherever possible.

The document is intended for use as a live, online guide to complaints handling and will be reviewed and updated when required and as a minimum once each year. The online version should, therefore, always be used for the latest information and guidance. Printing paper copies of either part of all of this document should be avoided and, where necessary, clearly marked with appropriate warnings.

This document provides instructions on what must be done when dealing with complaints, and the reader will, therefore see relevant sections include the word 'must.' These instructions must always be followed. Other parts of the document may offer recommendations on how best to deliver aspects of complaint handling, and in these sections, you will see the use of the word 'should'. In order to provide the best possible complaints-handling service to customers, it is important to understand the difference between these two situations.

If, after reading this document, you need any further information or clarification to enable you to deal effectively with any complaint, please feel free to reach out to our Resolution Team at customer.resolution@southwark.gov.uk or for broader enquiries you may contact the [Central Complaints Team] complaints@southwark.gov.uk. We are here to assist you in resolving any issues promptly and efficiently.

There are separate regulations applying to complaint-handling for Children's Services and Adult Social Care. We have a team who administers all complaints relating to those areas and to related areas including Education and Public Health. Whilst this guide reflects the principles followed by the team, the reader is advised that separate complaints processes and policies exist, and so there are procedural parts in this review which do not necessarily directly apply to those complaints,

Importance of Complaints Handling

Our primary objective is to handle all complaints in accordance with the LBS Complaint Policy. All customer feedback and particularly complaints should be welcomed as valuable opportunities to correct a customer issue arising from how we delivered a service and/or to improve our customer service delivery for the benefit of future customers. We aim to create an environment where complaints are treated with the utmost seriousness and addressed professionally. Our goal is to resolve all complaints promptly and fairly. Addressing complaints effectively demonstrates that we value our residents and their feedback.

Complaints provide an opportunity to rectify problems and improve customer satisfaction. By addressing complaints effectively, we show our commitment to resolving issues and to understanding and meeting customer expectations.

Where a complaint highlights the need for a working practice, procedure, or policy to be introduced or an existing one revised, the Resolution Team [central complaints team] will work with the relevant service manager(s) to ensure the necessary actions are carried out.

All lessons learned and service improvements brought about will be reported through departmental senior management teams (SMT) to the corporate management team (CMT) through quarterly reports.

Effective complaint handling also fosters a sense of trust and confidence among our residents'. By actively listening to their concerns and taking appropriate action, LBS demonstrates our commitment to addressing our resident's needs and maintaining transparency.

Handling complaints effectively also contributes to managing LBS's reputation.

Helping to Deliver 'Right-First-Time Customer Service

The most effective way to deliver excellent customer service is to aim to deliver everything we do in the right way, with the right outcomes on the first attempt. Achieving this aim relies on a continuous process of improvement in which customer feedback and complaints are used to improve the Council's services and reduce or eliminate those aspects of our service delivery which customers don't appreciate or which have a negative impact on customers.

Everyone within LBS has a role to play in supporting right-first-time delivery of our services. Staff support this aim through listening to customers, taking ownership for making sure feedback and/or complaints are passed to the appropriate team and being open to the need to improve as a result of learning from customer feedback and complaints..

Understanding Complaints

Complaint Definition

To ensure that residents feel heard and understood, effective handling of complaints begins with a shared understanding of what constitutes a complaint.

A complaint is defined as:

Any expression of dissatisfaction, regarding the service standard, actions, or inaction by the landlord, staff or representatives, affecting one or more residents.

Residents do not necessarily need to use the word "complaint" for their concerns to be treated as such.

Complaint Recognition and Handling

Residents must be given the option to escalate an issue to a complaint whenever they express dissatisfaction.

Even if a complaint is submitted through a third party or representative, it should still be addressed in accordance with LBS complaints policy.

Staff should differentiate between a service request and a complaint. A service request is a resident's request to the council for corrective action. Service requests should be recorded, monitored, and regularly reviewed.

Picture A below provides an example of how to determine whether a repeat customer contact is a service request or a complaint.

Identifying between a service request of a complaint

Many issues related to service requests, such as missed appointments, can often be resolved immediately with an apology and the provision of another appointment without entering the formal complaints system. However, if further investigation is required to resolve the matter or if the resident specifically requests it, the issue should be logged as a formal complaint.

Continuous Service Effort

A complaint, on the other hand, arises when a resident expresses dissatisfaction with the response to their service request.

LBS must continue to address the original service request even if it escalates to a complaint, ensuring that the service issue is resolved while also handling the complaint.

Feedback and Complaints via Surveys

Dissatisfaction expressed through surveys is not automatically treated as complaint, but residents should be informed about how to file a complaint.

When asking for feedback about any of our service, we must provide information on how to lodge a complaint.

Type of Complaints and their significance

Here are some types of complaints and their significance

- **Housing and Accommodation:** Complaints related to housing can include issues such as poor living conditions, repairs and maintenance, homelessness, overcrowding or delays in addressing housing needs. These complaints are significant as they directly impact residents' quality of life and well-being.
- **Waste Management and Environment Concerns:** Complaints regarding waste collection, recycling facilities, fly-tipping or environmental hazards are crucial for LBS to address. These complaints impact public health, cleanliness, and the overall environment of our borough.
- **Highways, Parking and Traffics:** Complaints related to highways include issues such as inadequate parking, road maintenance, or traffic congestion. These complaints are significant as they affect residents' mobility, commute times, and overall accessibility within the borough.

- **Community Safety and Antisocial Behaviour;** Complaints regarding community safety and anti-social behaviour encompass concerns about crime, noise disturbances, graffiti or drug-related activities. These complaints are crucial for our borough to address safety and well-being of residents.
- **Planning and development:** Complaints related to planning and development include issues such as inappropriate construction, lack of infrastructure, noise pollution from construction sites, or violations of building regulations. These complaints are significant as they impact the borough's aesthetics, infrastructure and residents' living conditions.
- **Children and Adult Services;** complaints are managed differently but this is a significant area of work particularly as so many service users have additional and complex vulnerability. Services include teams responsible for children in and around the care system and families who are involved in safeguarding activities. Complaints may relate to support for elderly or disabled people who need packages to assist them with their development and daily functioning. There are also limited functions related to Education
- **Revenue and Benefits;** complaints related to revenue and benefits can include delays in processing benefits claims, errors in benefit calculations, lack of communication, or challenges in accessing relevant information or support. Complaints regarding Council Tax can involve issues such as incorrect liability, billing, and disputes over exemptions or discounts, difficulty in accessing information, or resolving queries related to Council Tax payments. These complaints are crucial as they directly impact residents' finances and require fair and accurate administration.

Addressing these type of complaints is crucial for LBS to ensure the well-being and satisfaction of residents, maintain a high quality of life, and uphold the standards and regulations of the borough. By actively addressing and resolving these complaints, the Council can build trust and foster a positive relationship with the communities.

Impact of unresolved complaints on customer satisfaction and reputation

Unresolved complaints can have a significant negative impact on customers' satisfaction and perception of the Council. It can lead to dissatisfaction, loss of trust, and a decline in LBS's reputation.

Unaddressed issues may result in customers seeking alternative routes for resolution, for example, The Housing Ombudsman, legal routes, etc., damaging LBS's credibility and potentially leading to negative word-of-mouth spreading in the community.

Resolving complaints promptly and effectively is important for maintaining a positive relationship with customers and upholding the Council's reputation.

Recognising complaint channels

Channel for receiving complaints

The recognised and supported channels for receiving complaints within LBS are:

- Phone calls
- Emails
- Web forms
- Social Media platforms
- In person
- Feedback forms or surveys
- By post.

We want to ensure our complaints procedure is accessible to all. To do this we must remove barriers which may exclude an individual from accessing the process by taking account of any special needs and circumstances.

These might include:

- making home visits
- ensuring meeting locations are fully accessible
- making it possible for individuals to discuss matters in private
- suggesting advocacy or representation
- Arranging translation/ interpretation into other formats, including large print,
- Braille or a sign language interpreter.

Complaint handling performance and continuous improvement

In order to provide the best possible customer service the Council monitors key performance measures relating to complaints handling and resolution. The key measures include (but are not limited to);

- Stage one complaints received and their root causes
- Stage one complaints completed within the target number of working days and the average number of working days to complete.
- Stage one complaints which escalate to stage two investigations and the reasons for escalation
- Cases which are referred to the regulator/Ombudsman
- The results of the Ombudsman investigations and where cases are upheld, the judgement made by the Ombudsman

In order to improve levels of customer service and reduce the level of complaints and escalations, the Council operates a formal process of continuous improvement for complaint handling and resolution practices. This activity will focus on;

- reducing the number of re-occurring complaints with the same or similar root causes
- Improving the efficiency of resolving Stage one complaints within the targeted timeframe and reducing the average number of working days to complete.
- increasing the number of upheld complaints which are resolved at the earliest opportunity
- reducing the number of complaints which escalate from stage one to stage two investigations
- reducing the number of escalations which occur for the same or similar reasons
- minimising the number of complaints which are referred to the Ombudsman and which are subsequently upheld

Complaint Handling Principles

The following principles should be adopted when dealing with customer issues and complaints: we must always act with impartiality and an open-mind, giving residents a fair opportunity to express their concerns.

- **Empathy:** show genuine empathy and understanding towards the customer's feeling and concerns. Acknowledge their emotions and let them know that you value their perspective
- **Active listening:** Listen actively and attentively to the customer's complaint. Avoid interrupting and focus on understanding the issue fully before responding
- **Timeliness:** Address complaints promptly. Delaying resolution can escalate the situation and create further frustration for the customer
- **Transparency:** Be transparent and honest in your communication. Provide clear explanations of the situation, actions taken, and the expected resolution process
- **Ownership:** Take ownership of the problem and the resolution process. Avoid passing the customer to multiple department or individuals, as it can add to their frustration
- **Right-First-Time:** Always keep in mind that the best way for the Council to deliver services is to provide the required customer outcomes on the first attempt, and where this hasn't happened to resolve the situation as quickly as possible to the customer's satisfaction
- **Apology:** Offer a sincere apology for any inconvenience or dissatisfaction caused, regardless of who is at fault. A genuine apology can go a long way in diffusing tension.
- **Solution-oriented:** Focus on finding practical solutions that address the customer's concerns and needs. Involve the customer in the resolution process whenever possible
- **Consistency:** Ensure that complaint resolution procedures are consistent across all the customer's interactions. Consistency builds trust and confidence in the council
- **Continuous improvement:** Use complaints as opportunities for improvement. Analyse trends and root causes to identify areas where processes, products, or services can be enhanced
- **Follow up:** After resolving the complaint, follow up with the customer to ensure their satisfaction and check if any further assistance is needed
- **Feedback Loop:** Encourage customers to provide feedback on the resolution process, and use this feedback to enhance LBS's complaint-handling procedures

Early resolution and preventing escalations

After a complaint has been received, it is important that issues which have caused the complaint (if through failure of the Council) are addressed promptly and that the complaint itself is resolved to the satisfaction of the customer. Although there are a number of stages through which a complaint can

escalate, this must not be viewed as a reason for delaying resolution if it is clear what the customer is expecting and this is reasonable and within the Council's policy.

Complaints which have been investigated and where failure of the Council has been found should always be resolved at stage one, wherever possible.

Key stages in complaint handling (end-to-end process)

The process comprises of activities and decision points which deal with the following four main stages:

- Determining whether customer repeat contact is a complaint or whether issues can be resolved through appropriate service-based action
- Initial investigation (stage one) carried out by the relevant service team associated with the complaint issue with support from the central Resolution team if required. This will include attempts to fully resolve the complaint with the customer wherever possible.
- Receipt of a stage two complaint which is dealt with by the central Resolution team with investigation of why the complaint could not be resolved at stage one, and what the customer is expecting for resolution of the complaint. In all cases learning must be captured and acted upon to prevent similar escalation reasons from occurring again.
- Receipt of Ombudsman enquiries which the central Resolution team responds to on behalf of the Council. In addition to responding to all Ombudsman requests for further information, the Resolution team and the relevant service team must review learning and take action to prevent similar referrals re-occurring wherever possible, particularly those which result in the Ombudsman making serious judgements against the Council.

Importance of good record keeping for services and complaint handling

For successful complaint handling, learning, and reduction, it is essential that adequate records are kept of communication with the customer and action taken throughout service delivery and subsequent complaint investigations. This will greatly aid in the speed of investigation and the rapid resolution of complaints and also assist in the capture of learning and identification of improvements

required to prevent future re-occurrence of complaints. It will also reduce the time and resources required to support escalated cases at stage two and Ombudsman investigations where these occur.

Records must always contain clear information about;

- the date/time of contact
- person contacting the Council
- officer dealing with the contact
- clear description of issues needing resolution
- clear description of what commitment/promise was made to the customer
- date/time of any decision or actions taken
- date/time when actions were completed
- date/time when the resolution was discussed and/or agreed
- date/time when any written correspondence was sent
- date/time when responses were expected/due

In the majority of cases, date/time information will be captured automatically by the systems used within contact centres, service, and complaints departments. However, it is crucial to manually document decisions, actions, and follow-up details with care, ensuring that the notes are clear and useful for other officers who may refer to them in the future.

Learning from complaints and valuing feedback

An essential aspect of managing complaints effectively is capturing and learning the reason why the complaint arose and, if relevant, why a complaint was not resolved at the earliest opportunity. All learning should include actions for either preventing or minimising future occurrences of complaints due to these identified reasons. In a similar way, feedback from customers, delivery contractors, or others representing the interests of the customer are valuable in learning how to improve services and should always be welcomed, reviewed, and acted upon.

The main areas of learning and feedback capture are:

- causal reasons for stage one complaints must always be captured by service staff handling the complaint, and lessons learned and improvement actions should be captured wherever possible
- reasons for non-resolution of stage one complaints must always be recorded by service staff dealing with stage one complaints, and a clear description of the attempts to resolve included

- Any changes identified at stage two investigations on either the causal reason for the original complaint and the reason for escalation must be recorded along with recommendations where appropriate to improve the reliability of the initial information in the future. This information will be captured by the central Resolution team
- All investigations by the Ombudsman must be reviewed, and weaknesses at any stage of the Council's handling of the original service delivery or complaint handling identified, with recommendations for appropriate improvements to prevent re-occurrence

Complaint handling organisation and support

- A full description of the organisation details which support the handling of complaints across LBS is provided later in this document. The key parts of the organisation which support complaints handling are;
- All LBS staff should ensure that any negative feedback or potential complaints are escalated to the Customer Engagement team within Specialist Services via complaints@southwark.gov.uk.
- The Customer Engagement team will assess whether the matter is a complaint and if so log this on ICasework, or refer this matter as an opportunity for rapid resolution by the relevant service team. They will also handle customer notification/action where issues relate to non-Council services/responsibilities
- Contact Centre teams will determine whether repeat customer contact should be referred to relevant service teams for urgent remedial action or whether the matter is a complaint which is referred to the Customer Engagement team (via complaints@southwark.gov.uk who will log the complaint and initiate an appropriate initial investigation
- The Service teams which are the subject of a complaint must take full ownership of dealing with the complaint at stage one and full resolution wherever possible. Service teams should also, wherever possible identify learning about the cause and make recommendations for service improvement which would prevent or minimise the reoccurrence of this type of complaint in future
- The Resolution team (Central Complaints Team) will deal with stage two complaints and respond to Ombudsman investigations. Service teams must provide requested information to the Resolution team for both stage two and Ombudsman enquiries and within required timescales. Serious delays in responding to these requests, which could in turn, impact on the Council's ability to respond within Ombudsman set timescales, will be escalated immediately to at least the Head of Service level within the service.

Receiving a complaint

Criteria for a Complaint

- **Frequency of Contact:** consider how often the customer has contacted the council about the same matter. If a customer reaches out repeatedly, it may suggest persistent dissatisfaction or an ongoing issue that needs attention.
- **Service delivery failure:** Examine whether the customer's concern relates to a clear failure in the council's delivery of a service. This includes instances where the service did not meet its commitments or expectations, resulting in the customer's dissatisfaction.
- **Explicit customer statement:** If the customer explicitly states that they want their contact to be treated as a complaint, respect their request. Customers who use terms like "complaint" or express dissatisfaction should be considered as filing a formal complaint.
- **Negative feedback or potential complaints:** All LBS staff must remain vigilant for any negative feedback or signs of potential complaints. Even if a customer does not explicitly use the word "complaint" but expresses dissatisfaction or concern, it is imperative to flag such cases for further assessment and appropriate action.
- **Repeat customer follow-up contact:** It should be noted that not all repeat calls/contact is necessarily a complaint which needs to be logged as such. Contact Centre and Customer Engagement Team officers should apply the agreed criteria to confirm a complaint has been received.

This will include but is not limited to the following:

- How many times has the customer contacted LBS about this matter?
- Does the matter relate to a clear failure of LBS to deliver a service and does the cause require investigation?
- Has the customer stated that they want their contact to be treated as a complaint?

What to do if you receive a complaint

All complaints must be logged on ICasework, even those that are resolved on the spot by the service team, Contact Centre or Resolution team staff. The customer service officer will collect the information by using the LBS's Complaint [Webform](#), ensuring all information is captured. This should include, wherever possible, confirmation of the desired resolution outcome from the customer.

Try to deal with the matter straight away - ask the customer what action they would like us to take to resolve any concerns. Either by your own actions or speaking to colleagues you may be able to deal with the problem without further delay.

Give the customer whatever help they need - you may need to explain the complaints process or assist by writing details of the complaint on behalf of the customer.

All LBS staff: if the complaint relates to another service or department, please log the complaint on the LBS Complaint [Webform](#) so that it can be directed to the appropriate department. If you are unsure which service it relates to, you can record it as 'other', and the Business Support Team will ensure it gets forwarded to the correct team.

In instances where a complaint is logged incorrectly, the responsible officer must re-assign it to the appropriate department promptly. An incorrectly logged complaint should not be left until the due date, failure to re-assign promptly will result in the complaint not being accepted.

Initial assessment of complaint enquiry

- Pay attention to the communication: Read the complaint enquiry or listen to the complainant carefully to understand the issue. Pay attention to the details provided, including the specific problem, locations, individual involved, and any relevant dates or incidents mentioned.
- Identify if it is a service request: Assess if the complaint enquiry concerns a specific service provided by LBS. Look for references to services like housing, waste collection, council tax, parking permits, planning applications, or any other services provided by the council. If the issue relates to a service expectation, quality, or failure, for example a missed collection, missed appointments then it is likely to be a service request.
- Determine policy or a behaviour: Assess if the complaint enquiry extends beyond a specific service incident or questions about a council policy, procedures, or staff conduct. It is more likely to be a complaint.
- Consider the emotional tone: Take note of the emotional note and language used in the complaint enquiry. Complaints often bring frustration, dissatisfactions, or anger indicating a deeper level of disappointment. Service requests, on the other hand, are typically neutral or looking for assistance without expressing strong negative emotions.
- Evaluate the desired outcome: Assess the expectations or desired outcomes expressed by the individual making the complaint. If they are seeking a resolution, redress, or action from LBS, it suggests a complaint. If they are primarily requesting a specific service to be provided or improved, it leans towards a service request.

Non-council enquiries

Customers should only be referred to an outside agency, such as the Citizens Advice Bureau (CAB), when it is likely that they will require independent advice. Customer Services Officers should ensure that all service enquiries are dealt with appropriately.

When dealing with non-council enquiries, please refer to the non-council enquiries link on support to direct the customer. You can also use our acknowledgement template for non-councils' services and add the information for the customer to refer to. (Link will be provided)

Is there a time limit for making a complaint?

We will not normally consider a complaint that is made more than 12 months after the individual first became aware of the issue they want to complain about. This is in line with guidance from the Ombudsman. There may be exceptions to this if the council accepts such a delay is reasonable.

In such cases, the investigating officer handling the complaint will discuss the matter with the Complaint Manager.

If we decide that the complaint is 'out of time' we will explain why and inform the complainant of their right to take the decision to the appropriate ombudsman.

Staff complaints

It is important to avoid any situation where an officer responds to a complaint made against themselves. Such instances undermine the complainants' confidence in the complaints procedure. Instead, line managers should take charge of investigating and addressing any staff complaints.

If you receive a complaint regarding an officer, please ensure that all relevant information is captured and logged onto the Southwark Complaint Web form. Our dedicated Business Support team will ensure the complaint is appropriately assigned to the correct team for further action.

Information gathering

The Customer Service Officer must collect all essential information related to the complaint. This includes details such as the complainant's name, contact information, nature of the complaint, date, time, location, and any supporting evidence such as photographs or witness statements.

- When handling complaints. You must take certain steps to ensure smooth process. One important aspect is to identify any previous contacts the complainant has made. This helps in a few ways:
- Knowing the history of the interactions provides a deeper understanding of the issue at hand. It allows you to see the complaint has arisen due to a recurring problem or if it's an isolated incident.

- Identifying the previous points of contact assists in determining the specific service or department responsible for the failure. This ensures that the complaint is directed to the right team for a targeted response.
- if the complainant has already reported the same issue and doesn't see any progress, they might become frustrated. By acknowledging their previous attempts, LBS shows that they value the complainant's time and effort.

Accuracy and Completeness

The Customer Service Officer must ensure that the information entered in the Council's systems or forms is accurate and complete. Care should be taken to avoid errors or failings that could impact the resolution process or in dealing with the case in future.

To ensure comprehensive record-keeping, it is of utmost importance that you accurately enter all relevant details concerning the enquiries and the actions taken into the LBS web forms or directly onto ICasework.

Conflicts of interests

Identify and manage any conflicts of interest immediately as soon as it is detected. If a conflict of interest arises during the complaint handling process, the involved staff member must remove themselves from the case.

The complaint must then be reassigned to an impartial staff member who will continue the process to ensure a fair and unbiased resolution.

Categorisation and prioritisation

Efficient resource allocation: Categorisation and prioritising in Complaint Handling is important for effective and efficient resolution. By understanding the nature and urgency of each complaint, the Council can assign appropriate staff, time, and expertise to address them.

Timely response and resolution: Prioritising will allow the council to address high-priority complaints promptly. Urgent or critical complaints that pose risks to individuals, public safety, or essential services can be given immediate attention. By addressing these issues in a timely manner, the council can prevent further harm, mitigate risks, and maintain public confidence in our ability to handle complaint effectively.

As the 'First Point of Contact', your immediate assistance plays an important role in dealing with urgent and critical enquiries, effectively avoiding risks. It's important to promptly take action by raising service requests or seeking assistance from colleagues and follow up any actions taken to the residents involved. Also ensuring that any information is added on to our systems as part of our obligations for record keeping.

Identifying appropriate categories for complaints

Understanding the criteria for prioritising complaints based on severity, impact, or public safety concerns

Severity of the issue: Complaints that pose a severe risk to public safety, health or essential services should be given top priority. For example, a complaint about a dangerous road condition that could lead to accidents or injuries would be prioritised.

Immediate Public Safety Concerns: Complaints related to immediate public safety concerns, such as a gas leak, collapse buildings, or large-scale emergencies, require immediate attention and should be prioritised accordingly

Impact on large number of people: Complaints that affect a significant number of individuals or have widespread implications, such as major service disruptions or infrastructure failures, should be prioritised to mitigate the impact on the community.

Legal or regulatory requirements: Complaints that have legal or regulatory requirements associated with them, such as compliance with environmental regulations or obligations under specific legislation, should be prioritised to ensure that adherence and avoid legal consequences.

Repeat or Chronic issues: Complaints that indicate recurring or chronic problems within LBS, such as persistent service failures which may causes further issues, for example damp and mould, unresolved administrative issues, should be prioritised to address underlying systemic issues and prevent future complaints.

Acknowledging a complaint

Confirmation of receipt: An acknowledgment letter assures residents that their communication, whether it is a complaint, enquiry, compliment, or service request, has been received. It provides peace of mind to residents, knowing that their concerns or feedback has been acknowledged and are being taken seriously.

Transparency and Accountability: By sending an acknowledgment letter, LBS demonstrates transparency and accountability. It shows that the council values open communication with residents and it is committed to addressing their concerns promptly and fairly.

Establish expectations: An acknowledgment letter sets clear expectations for residents regarding the next steps in the process. It can outline the timeline, procedure, desired outcome, or point of contact for addressing their specific issue. This helps manage residents' expectations, reducing uncertainty and frustration.

Providing Complainants with information on the expected timeframe and next steps

The complaint acknowledgment letter must include an understanding of the complaint and the desired outcomes the resident seeks. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between the customer service officers and the residents.

Investigation and resolving complaints

Receiving and acknowledging complaints (stage one)

Log complaint: all complaints must be logged onto the ICasework case management system ASAP.

If a complaint is received via phone call, it should be logged immediately, preferably simultaneously, while the call is taking place. If it is received via email or web form, the receipt date in ICasework will match the submission date unless the complaint was submitted at the weekend or a public holiday, in which case the Receipt Date will be the next working day

The Customer Engagement Team (Business Support)

The customer service officer must collect all essential information related to the complaint. This may require interrogation of the various customer management systems to obtain the required details. The following details should be obtained in all cases:

- Name
- Address
- Email address
- Telephone number

- Date of Complaint
- Correct method of complaint recorded
- Clear description of complaint
- Desired outcome recorded
- Correct department/service selected
- Attached documents (supporting evidence)
- Consent (if required)
- Check for previous cases/duplication checks completed.

This information is essential to the correct initial assessment of the complaint and the correct allocation to the service/department, which will handle the stage one investigation or act as a lead for complaints that involve issues with more than one service.

Accuracy and Completeness: The Customer Service Officer must ensure that the information entered into the council's systems of forms is accurate and complete. Care should be taken to avoid errors or failing that could impact the resolution process or data analysis in the future.

Categorisation and prioritisation: The Customer Service officer must ensure that the case is assigned to the correct department, individual or team. A priority (high or normal) should be determined and advised when the case is allocated to a service for investigation. This priority is important for determining in which order cases are investigated, where multiple case are received within a short time period, or where a new complaint may need to be prioritised before completion of others. The relevant team must always be made aware of the urgency and nature of each complaint.

Acknowledgement: An acknowledgment letter/email must be sent out for all complaint cases within 5 working days of receipt. This notification is to provide the customer with important information about the council's understanding of their complaint, what they would like to happen in order to resolve the complaint and details of who will be dealing with the complaint.

It should be noted that to obtain all the required information, it is likely that an officer will need to make direct contact with the customer. Where this is not possible to reach the customer immediately and required information is outstanding, the letter should include the information which the council has and a request for the specific information which is missing.

Template for typical acknowledgment letters, including requests for missing information and for the customer to make contact we the council has not been able to reach the customer, can be found at the: {Link to templates}.

The acknowledgment letter should include the following details in all cases:

- Date complaint received
- Summary of complaint
- Desired customer outcome
- Due date for formal response
- Team/individual who will be dealing with the complaint
- Contact details given
- Whether any further information (specify) is needed
- Whether any unsuccessful attempts have been made to obtain missing information
- Implications of not receiving missing information
- Team signature

Investigation & resolution – Stage Once Complaints

The purpose of stage one complaints is to carry out a thorough impartial investigation to determine what fault in service delivery occurred, its impact on the customer, and how best to resolve the matter to the satisfaction of the customer in the most timely manner. Stage one investigations must always be considered as the preferred point of resolution wherever possible, and escalation to stage two and beyond as a serious failure in the service team's complaints handling.

The latter is particularly relevant where a case has the potential for resolution at stage one, but through weaknesses in complaint handling, the matter escalates beyond stage one without resolution.

The key steps involved in stage one investigations and resolutions are detailed below.

Contact Customer: The investigating officer must contact the customer at the start of the investigation to obtain any relevant information not initially provided, including what the customer is seeking at a satisfactory resolution to the case. As the investigation is concluding, the customer must be contacted again to agree on how the case will be resolved, the resolution plan (if required), and what to expect to happen moving forward. It may also be necessary to notify the customer if an extension is required – a holding response should be sent out in this case clearly explaining the reason for the delay. Any extension must be no more than 10 days and all holding response must include information on how to escalate to the Ombudsman.

Contact relevant parties: The investigating officer must contact all relevant parties (contractors, colleagues, and external parties) to obtain details relating to the complaint, including what went wrong, why, and the likely impact on the customer.

Compensation: The council's compensation policy defines when compensation may be payable, and it is important that this policy is followed consistently and fairly for all customers. It is important that eligibility for compensation is assessed and, where relevant paid regardless of whether the customer requests compensation or not. The investigating Officer must, in all cases, evaluate if compensation is needed in line with the compensation policy. The following link provides access to the LBS Compensation Policy.

Alternative remedies: In addition to any compensation which is due to the customer, there may be alternative remedies which can be applied to fully address the complaint. The Investigating Officer must evaluate if alternative remedies are needed and, if these are appropriate, discuss and agree in principle what resolution steps will be taken.

Alternative remedies may include (but not limited to):

- An apology
- Taking action if there has been a delay in dealing with the complaint
- Amending a record to remedy incorrect information

Seek advice: Where agreeing resolution is difficult, and the investigating officer within the service team has tried all reasonable steps, the officer must seek advice from the Customer Resolution Team (Central Complaints Team) to identify further options for reaching a successful resolution. As stated previously, it is important that all reasonable steps are taken to resolve complaints as promptly as possible.

Escalate to Manager: When the investigation Officer has exhausted all potential 'within policy' resolution options and taken advice from the Customer Resolution Team, then the investigating Officer must escalate the complaint to the relevant manager to identify whether the case warrants an 'out of policy' resolution to prevent potential escalation of the case. This assessment will need to consider the likelihood and potential impact of escalation.

The service manager will also consider whether further escalation is required where risks and impacts are high.

Implementation Plan: The investigation officer should identify any service-based changes/improvements which would prevent the re-occurrence of this type of complaint or make future handling of this type of complaint more successful within the service. Where such

improvements are identified, the investigating officer must action an appropriate Implementation Plan to ensure these changes are put in place in a timely manner.

Documentation: As stated previously in this document, the preparation of complete and accurate documentation to allow other officers to deal effectively with further enquiries about how the stage one investigation was carried out is very important. Therefore, the investigating officer must ensure that all findings, decisions, actions taken, and all supporting documents are recorded on the case management system (ICasework).

Multi-service Complaints: In the case of complaints about multiple services, the complaint will be allocated to a lead service (and team) for stage one investigation and resolution. In these cases, the lead investigating officer must coordinate inputs from all relevant services and ensure responses are received in a timely manner. The lead officer is responsible for discussing and agreeing resolution options with the customer and in providing a formal response within target timescales.

Management of additional issues: During the investigation of your complaint, should any additional issues be raised that are related to the original complaint and before the finalisation of the stage 1 response, these issues will be incorporated into the current complaint process to ensure a comprehensive resolution. If new issues are identified after this response or if they are unrelated to the initial complaint, they will be treated as new complaints.

Stage One Response: The Investigative Officer must provide the customer/complainant with a formal written response addressing their complaint in full, and summarising the findings and proposed resolution steps. :

The response will be issued even if the actions required to fully resolve the complaint are ongoing. We must continuously update on the progress of these actions until complete resolution is achieved.

The response letter must include the following information:

- Acknowledgement and apologies if response is late
- Date complaint received
- Customer's name
- Complaint stage
- Summary of complaint
- Description of desired outcomes
- Supporting evidence (if needed)
- Thorough description of investigation
- Correct use of policy, law

- Confirmation customer aware of outcome
- Reason of outcome
- Clear outcome of complaint and remedies offered if necessary
- Clearly upheld / not upheld removed partially upheld
- Details of resolution plans, if necessary
- Escalation details
- Details of the implementation plan, if needed

Investigation, learning & Resolution – Stage Two Complaints (Escalations)

The purpose of carrying out a stage two complaint investigation is to address customer concerns that the stage one complaint investigation and resolution were inadequate and to confirm whether the handling was carried out according to LBS policy. If there were omissions or mistakes made in the stage one investigation, the stage two investigation must establish how to address these.

This may include (but is not limited to) whether the decision on upholding the complaint was correct based on all currently available information and whether all reasonable steps were taken to resolve the complaint to the customer's satisfaction.

It is important that the stage two investigation is impartial and carried out on behalf of the Chief Executive. The investigating officer should not have any bias towards the council or its services and be empowered to challenge services and policies with the service user at the heart of the investigation.

In addition, the stage two complaint investigation process should confirm if a resolution cannot be agreed, that the way LBS has managed the stage two process and attempted to resolve the complaint fully complies with guidelines from the Ombudsman, and that the risks of a serious judgment against LBS are low.

It may also be necessary to notify the customer if an extension is required – a holding response should be sent out in this case clearly explaining the reason for the delay. Any extension must be no more than 20 days and all holding response must include information on how to escalate to the Ombudsman.

Escalation: If the resident is not satisfied with the outcome of stage one, the Investigating Officer must notify the Customer Resolution Team for the case to be escalated from stage two. The

customer may also escalate the case directly by submitting an Escalation web-form via the council website, which is sent directly to the Customer Engagement/Business Support Team who log the escalation and associated information on ICasework. The resident does not have to state the reason for their escalation.

Stage two complaints are handled by the Resolution Team (Central Complaints Team) with the support and full cooperation of the relevant service/department named in the complaint.

Escalation recorded: The Investigating Officer must notify the Customer Resolution team of an escalation within 24 hours.

System interrogation: The Investigating Officer must interrogate all case management systems and service systems to obtain all relevant information relating to the case and to find additional relevant information. This should include the reason why the case was not resolved at Stage One.

Escalation reason: The Investigating Officer must identify the reason for escalation and make all relevant parties and teams aware. If further information is required, the Investigating Officer must contact the customer directly to gather this additional information. The complaints handling process seeks to minimise escalations.

So the Officer should satisfy himself/herself that the reason being recorded is both complete and accurate. The Officer must also identify clear recommendations and, in conjunction with any service representatives (if necessary) identify improvements to service delivery or stage one complaints/resolution handling to prevent escalations from occurring in the future.

Desired outcome: The Investigating Officer must identify what the customer believes would be an appropriate resolution outcome, and must clarify why resolution was not agreed during stage one.

Prioritisation: The Investigating Officer must ensure that the case is assigned to the correct department, individual or team. Priority (high or low priority) of the case should also be determined, and the relevant team should be made aware of the urgency and nature of each complaint.

Confirm stage one response sent: The investigating Officer must ensure that a response letter has been sent to the customer regarding their stage one complaint.

Advice: The Investigating Officer must seek advice from management if the escalation complaint is unclear or if advice is needed.

Assign case for stage two investigation: The Investigating Officer must assign the case as a stage two complaint once stage one is completed, the formal response sent, and it is determined that the stage one response was unsatisfactory.

Acknowledgement: An acknowledgment letter must be sent within 5 working days for the stage two complaint. This letter should include the following details:

- Date escalation notification received
- Reason for and summary of escalation
- Desired customer outcome
- What resolution options were offered at stage one
- Due date
- Team/individual who will be handling the stage two complaint
- Customer contact details given
- Team signature

Stage two investigations

Contact customer: The investigating Officer must contact the customer at the start of the stage two investigation to ensure that all relevant information about the complaint and reasons why a resolution was not agreed is now available.

The Investigating Officer must discuss the following with the customer on receipt of the stage two case:

Discuss the previous complaint (at stage one) and any further information which is relevant to stage two

- The desired outcome and why this wasn't achieved at stage one
- Agree further contact points during the stage two investigation
- What the customer should expect and how long the process should take.

System interrogation: The Investigating Officer must interrogate all case management systems and service systems to obtain all relevant information relating to the original case, the stage one investigation, and findings and attempts to resolve the complaint at stage one. The officer should also obtain any further relevant information from the case management and service systems which may not have been taken into account during stage one. Any information used as part of the investigation must be reported to the service and logged onto the ICasework system.

Contact relevant service: The Investigating Officer must contact all relevant parties (contractors, colleagues, and external parties) to obtain any further required details relating to the complaint. If the response is not received in time, the case should be escalated to senior management within the service. Contact should be made through the casework system (ICasework) to ensure an audit trail is created.

No response:

- If there is no response to information requests within 3 working days, the case should be escalated to the service manager.
- If there is no response within a further 2 working days, the case should be escalated to the Head of Service.

Review of stage one findings and resolution options: The stage two Investigating Officer must review the findings and resolution options identified during stage one, including the compensation which was due (within the compensation policy), alternative remedies (see above for stage one description), and the escalation to and degree of involvement of senior managers in an attempt to find a resolution offer outside of policy which would be acceptable to the customer.

The Investigating Officer should check the notes on why these resolutions options were not acceptable, and if these notes are inadequate or unclear, then further contact should be made with the customer to clarify what a suitable resolution would be. Where remedies are required, Investigating officers needs to refer the complaints, compensation policy any guidance the ombudsman has on the matter

As with stage one investigation, the Investigating Officer must ensure that all findings decisions, and actions during stage two are fully documented within the case management system (ICasework).

Once the stage two investigation is complete, the relevant service manager will be notified of the findings and whether a resolution has been achieved. The stage two Investigating Officer should obtain written approval (via email) from the service management that the service is approving the findings and outcome of the complaint at stage two.

Head of Service (HoS) notified if the complaint is not upheld: **In the event that the stage two** investigation finds that the complaint is not upheld (either confirming or altering the stage one finding), the stage two Investigating Officer would notify the relevant HoS with reasons for the decision.

Head of Service (HoS) notified if the complaint is at risk of escalating further: If there is a risk that the unresolved complaint at stage two is likely to escalate further to an Ombudsman enquiry, then the stage two Investigating Officer must notify the relevant HoS before the response to the customer is sent. The HoS should be given an opportunity to identify any further options ('out of policy') for

resolution, which the Investigating Officer can then discuss with the customer in order to resolve the complaint and remove the risk of further escalation.

Stage two response: The investigating Officer must provide the customer/complainant with a response addressing their complaint. The response letter at stage two must include the following information:

- Acknowledgement and apologies if response is late
- Date received
- Customer name
- Complaint stage
- The complaint definition
- Summary of complaint
- Reason for escalation
- Description of desired outcomes
- Supporting evidence (if needed)
- Thorough description of investigation
- Apologise when things have gone wrong
- Provide explanation, assistance or reasons
- Correct use of policy and law
- Confirmation customer aware of outcome
- Reason for outcome/ decision made and apologies
- Clear outcome of complaint and remedies offered if necessary
- Details of any outstanding actions
- Clearly upheld/ not upheld removed partially
- Details of resolution plans if necessary
- Ombudsman details for escalation
- Details of implementation plan (if needed)

Learning from Complaints and Escalations (stage two): the Investigating Officer, with support from the relevant service team, must identify for all stage two investigations the learning obtained on the cause of escalations and the root cause of the original complaint.

The Investigating Officer and relevant service team should identify and agree the necessary improvement steps to reduce or eliminate the re-occurrence of a particular root cause for original complaints and to reduce or eliminate the re-occurrence of specific escalation causes. The details of these improvement plans, along with key implementation milestones, should be recorded on ICasework so that progress can be tracked.

The Resolution team (Central Complaints Team) must check that implementation plans are recorded on ICasework for each stage two complaint unless an existing plan is already in place but not fully implemented. The Resolution Team should track progress with all plans and escalate to HoS any which are delays or otherwise not meeting their planned milestones.

Resolution Plan

When a complaint requires comprehensive action and resolution, the following resolution plan must be implemented to guide the complaint process effectively and ensure the customer's concerns are addressed satisfactorily.

This plan is a critical component of the complaint-handling process, ensuring that customer concerns are methodically and satisfactorily addressed at every stage.

Key objectives of the resolution plan include:

Timely Resolution: The resolution plan sets realistic and reasonable timeframes for resolving the complaint, ensuring it is addressed promptly and efficiently.

Effective Communication: It establishes a framework for ongoing communication with the customer, including regular updates on the progress of the complaint.

Accountability: The plan allocates responsibilities to relevant officers and contractors, ensuring that tasks are assigned to the appropriate parties and that progress is monitored.

Timely Adjustments: By including checkpoints, the plan allows for early identification of any deviations from the resolution path, enabling prompt adjustments to maintain progress.

Escalation Mechanism: In the event of delays or setbacks, the resolution plan provides a mechanism for escalation, ensuring that issues are addressed promptly to prevent unnecessary delays.

Customer Satisfaction: After completing all tasks in the plan, the Investigating Officer must contact the resident to confirm their satisfaction with the resolution, ensuring that the customer's concerns have been adequately addressed.

Fair Compensation: If the resolution plan extends beyond the expected timeframe, the Investigating Officer discusses any additional compensation with the customer, demonstrating a commitment to fairness and customer satisfaction.

Further Escalation: In cases where the customer remains dissatisfied, the resolution plan allows for escalation to higher levels, such as case officers and managers, ensuring that all avenues are explored to achieve a satisfactory resolution.

Training Support: Investigating Officers will receive relevant training through e-learning to equip them with the necessary skills and knowledge to implement the actions outlined in the plan effectively.

Ombudsman Enquiries

Ombudsman enquiries within LBS are integral to ensuring an impartial and accountable review mechanism for residents and stakeholders voicing concerns about the council's services or decisions. The primary objective of these enquiries is to evaluate the concerns raised, ascertain the nature of any service shortcomings, and determine appropriate remedial actions that uphold principles of fairness, transparency, and public trust.

Embracing and addressing ombudsman enquiries underscores the council's dedication to its residents, highlighting a steadfast commitment to refining the quality of its services. Engaging proactively with such enquiries not only addresses individual concerns but also highlights areas that might benefit from improvements or reforms. It's imperative that ombudsman enquiries be viewed as invaluable feedback channels. Escalation to this level, especially when an earlier resolution was feasible, may highlight potential areas of improvement in the council's complaint-handling processes.

The section below outlines the steps for handling and settling ombudsman enquiries within LBS.

Immediate acknowledgment: On receipt of an ombudsman enquiry, the Investigating Officer must promptly acknowledge receipt.

Head of Services (HoS) notified: As soon as an Ombudsman enquiry is received, the Investigating Officer must ensure that the HoS is aware of the situation. The details of the enquiry, along with the stage two findings, should be shared comprehensively to enable informed decision-making.

Designated coordinator: Assign an Investigating officer to handle the ombudsman enquiries to ensure consistent responses. This officer becomes the main point of contact throughout the enquiry process.

Understanding the enquiry: Thoroughly review the enquiry nature. Determine if it's related to a specific service, decision, or incident.

Compilation of relevant information: Collate all relevant documentation, including internal reports, communication logs, and decisions.

Audit trail: All communications, findings, and actions in relation to the Ombudsman enquiry must be meticulously documented in the Council's ICasework system.

Ombudsman Response Formulation: Post consultation with the HoS, the investigating officer must draft the council's formal response to the Ombudsman. This must:

- Address each aspect of the enquiry in detail
- Highlight relevant findings from the stage two investigation
- Include any measures, changes, or actions taken after the stage two investigation
- Clearly state the council's stance and reasons for such a position.

Final Review before submission: Once drafted, the response to the Ombudsman must be shared with the HoS for a final review. Any recommendations or modifications suggested by the HoS should be incorporated, ensuring the response sent is comprehensive, accurate, and aligned with the council's position.

Continuous improvement: Post the Ombudsman enquiry, irrespective of its outcome, LBS must look at it as a learning opportunity. The Complaint Manager, alongside the HoS, should identify any areas of improvement in the process, communication, or service delivery. This aids in refining practices and minimising the chances of similar escalations in the future.

Complaints Handling Audit and Quality Checks

As part of the Complaints and Members Enquiries handling review, we have a Quality Assurance team in place, to ensure that the Council is compliant with its Complaints policy/handling procedure. The Quality Assurance team will be auditing a sample of Complaints and Members Enquiries cases on a monthly basis.

Audit reports will be generated to analyse the performance and effectiveness of complaint/enquiry handling.

The audits performed, will assess whether the cases are handled in accordance with the Complaint Handling Procedure.

The audit reports will highlight areas for improvement, and may identify risk areas or outline recommendations to the relevant service manager(s). Audit reports will be sent to Heads of Services/Directors as necessary.

Any recommendations made by the Quality team would require remedial action with higher risks taking higher priority. Services must take action by the due date provided and outline what action they plan to take to improve on the risks identified.

The progress of remedial actions proposed by the services will be tracked, and improvements in the risk areas identified are expected one month after the due dates.

Further Information and Support

Contact Details

Customer Resolution Team

Resolution Team

- Directorate: Finance
- First Contact: Clare Johnson
- Second Contact: Jay Stephenson

Corporate Complaints / Ombudsman (Specialist Services)

- Directorate: Finance
- First Contact: Clare Johnson
- Second Contact: Jay Stephenson

Customer Engagement/Business Support Team

- Directorate: Finance
- First Contact: Daniella Perreau
- Second Contact: Martha Obeng-Dampney

Complaint Central Team

Resolution Team

- Directorate: Finance
- Contact: Clare Johnson

Customer Engagement/Business Support Team

- Directorate: Finance
- Contact: Daniella Perreau

Business Rates/ Revenue and Benefits/Payroll/Rent/ Service Charges/Welfare Assistance Scheme

- Directorate: Finance
- Contact: Matt Swapp

Repairs and Maintenance

- Directorate: Housing
- Contact: Lawrattu Patton

Technical Projects Officer, Strategy & Business Support

- Directorate: Housing
- Contact: Duncan Ford

Contact Centre (Housing)

- Directorate: Finance
- Contact: Ashoke Choudhury

Contact Centre (Environment)

- Directorate: Finance
- Contact: Helen Nugent