

Complaints Annual Report

Corporate Services

Author: Sue Thomas



Corporate Complaints Procedure

Annual Report

1 April 2023 - 31 March 2024



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Purpose of the Report

This report provides information on complaints and feedback received by Staffordshire County Council for the period April 2023 to March 2024 that relate to all services within the Council, excluding adults and children's social care. Complaints about those specific service areas managed by two different statutory processes and are subject to separate scrutiny.

What is the Corporate Complaints Procedure?

The aim of the Corporate Complaints Procedure is to make sure that:

- complaints are dealt with to a fair and consistent standard
- the Council responds to complaints in a reasonable timescale
- outcomes from complaints are documented and shared throughout the Council
- a 'do it once do it right' approach is taken to complaints

The Council has based its complaints procedure on guidance set out in the Local Government and Social Care Ombudsman's 'Guidance on Running a Complaints System 2009'. The guidance explains the principles underpinning a successful complaints procedure:

'Complaint systems are not mechanisms for apportioning blame but an important part of a council's learning and development. Complaints can be a rich source of information and learning about how a council's performance is perceived and how it can be improved. What we recommend is a clear, accessible and flexible process that forms part of service provision and does not overwhelm individuals, departments or other council processes. The purpose of a complaints system is to put right what has gone wrong and learn from it.'

What is a Complaint?

An expression of dissatisfaction about a council service (whether that service is provided directly by the council or by a contractor or partner) that requires a response.

It is important to note that there are exclusions within the Corporate Complaints Procedure and not all complaints will be addressed under this procedure, even if the resident has identified their concerns as a complaint. The following are examples of exclusions under this procedure:

- First time request for service
- Certain highways issues
- Suggestions for improvements to council services
- Council action or lack of action that affects more than one individual, such as local highways or community issues
- Claims for damages
- Matters where an alternative and more appropriate course of action exists

The Corporate Complaints Procedure

Complaint/feedback received by the Council

Details of the complaint are assessed by the Complaints Team for allocation to the relevant process. The assessment can include reference to relevant policy/procedure/process, records held by the Council, information sought from the service area

Refer to online reporting service

Customer notified by Highways

Enquiry/
Comment /Not eligible for the CPP

Passed to service to provide response

Informal Resolution

Initiate CCP and passed to service to respond

Complaints Team allocates to appropriate service who investigate concerns and provide a response directly back to the customer. Timescale - 10 working days
Customer is advised that they may request further consideration complaint is not resolved informally

Formal Complaint

Escalate straight to CCP formal investigation

Stage 1 Investigation
Scope of investigation identified by the Complaints Team.
Confirmation of formal complaint investigation sent to customer.
Investigation allocated to manager of the service for investigation process to commence.

Timescale - 20 working days
Customer provided with written response and is advised that they may request a Stage 2 Review in line with guidelines set out in CCP



Stage 2 Review Request

Accepted - Stage 1 investigation and response reviewed by Senior Manager

Timescale 25 working days

Final response from the Council - complainant signposted to the Local Government & Social Care Ombudsman

Refused - No further consideration of complaint by the Council. Complainant signposted to Local Government & Social Care Ombudsman

The Role of the Complaints Team

The Corporate Complaints Procedure covers a wide range of Council services and infrastructure that are accessed and used by Staffordshire residents on a daily basis. The Complaints Team are responsible for assessing complaints and feedback about these services and screen each one to identify the most suitable way to address the issues raised.

Classification of Complaints and Feedback:

Refer to Online Reporting Service:

Any new issues such as highways defects, parking problems or rights of way concerns are not considered under the CPP and will be referred to the Council's online reporting systems. Examples can include:

- Notification of a new highways problem that has not been reported before
- Update on an existing issue
- Requests to re-open a closed report
- Problem parking on a residential street
- Blocked footpath that is a right of way
- Notify the Council of a claim for damages

Duty Enquiry/Comment/Not Eligible for Corporate Complaints Procedure):

The majority of matters received by the Complaints Team fall under these categories. The team will log and contact the service to obtain a response for the resident. Types of feedback for this category are:

- Roadworks causing delay or disruption/diversion route
- Follow up/query in respect of highways reports
- Standard of works completed
- A general comment or observation about a Council service
- Disagreement with a decision that has been made in line with council policy
- Suggestions for improvement
- Issues that affect a number of people, not an individual

Informal Resolution:

Complaints that are identified as Informal Resolution must be about issues that are eligible for the Corporate Complaints Procedure and can be resolved quickly and without the need for detailed investigation. There must be evidence of potential service failure but not to the extent that requires a formal investigation. The service must respond directly to the resident and endeavor to reach a suitable resolution. For example:

- Delay in receiving library book
- Problems with renewing Blue Badge or Bus Pass
- Difficulties in accessing online services

Formal Complaint:

An issue will be considered under the formal complaints procedure whereby there is evidence of potential service failure and that this has impacted directly on the person who is making the complaint. These can include:

- Blocked drain has not been inspected despite being reported to the Council. The situation has worsened, and water is encroaching on the resident's property
- Roadworks have prevented a resident accessing their property
- Changes to the lighting provision outside a property has resulted in the light shining directly into the resident's property and impacting on their day to day living
- Works not carried out despite being advised that they would take place
- Conduct of a member of staff towards a resident
- Affected resident not included in consultation of local project
- Evidence of an application for a service not considered properly

The Complaints Team will define the issues that require investigation from the information submitted by the complainant. This assists the process by:

- Identifying the key issues that require investigation
- Ensuring that each complaint is considered separately and provides the complainant with a clear decision as to whether their complaint has been upheld or not
- Captures themes and trends for reporting purposes

It is important that a complaint is dealt with via the correct process from the beginning to avoid any potential future maladministration. Issues that are not eligible for handling under the formal complaint's procedures will be directed as appropriate.

Complaints are directed to the relevant service area, and progress is monitored to ensure that a response is provided within corporate timescales. Complaints are responded to at the point of service delivery giving the service area subject of the complaint the opportunity to respond to any concerns raised about it. The manager of the service is also best placed to provide a knowledgeable and comprehensive response to the complaint. They can identify where things have gone wrong and propose a suitable remedy to the complainant.

The Complaints Team do not usually provide a response to complaints unless in exceptional circumstances. This is to provide the resident with confidence that the team offers an impartial service that can support them in making representation to the Council. The team provides advice to persons wishing to use these procedures and offers staff members support and guidance on how to appropriately handle and respond effectively to complaints about the Council.

Learning From Complaints

All officers investigating and responding to complaints are encouraged to document any identified learning that has arisen from the investigation in order that this information can be used to improve existing practices. Sharing details of the complaint and investigation are also done in team meetings to allow teams to contribute to future service improvements.

It is expected that in all circumstances, complaints are investigated properly and that complainants are treated fairly and with empathy. An apology will often be offered in recognition that the resident will have felt sufficiently aggrieved to contact the council to make a complaint, even in cases whereby the complaint has not been upheld.

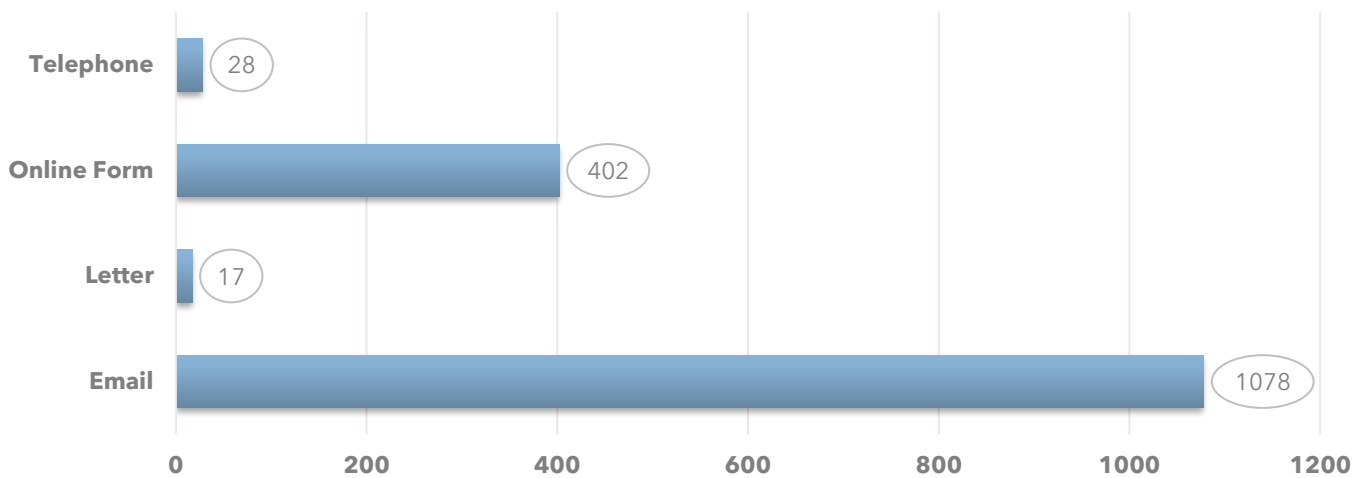
Collation of Data

Complaints are collated on a bespoke database that records details of the service subject of the complaint, the nature of the complaints raised, the outcome and remedies/learning.

Making a Complaint

In line with the Council's digital strategy, residents can contact the Complaints Team via a designated email address and online form. However, we do recognise that in certain circumstances, residents wish to have a conversation with the team and therefore we also have a direct telephone line which is available Monday to Friday 10am to 2pm. The chart below shows the methods of contact used by residents to raise complaints/feedback with the Complaints Team. Digital communication continues to be the preferred option for residents.

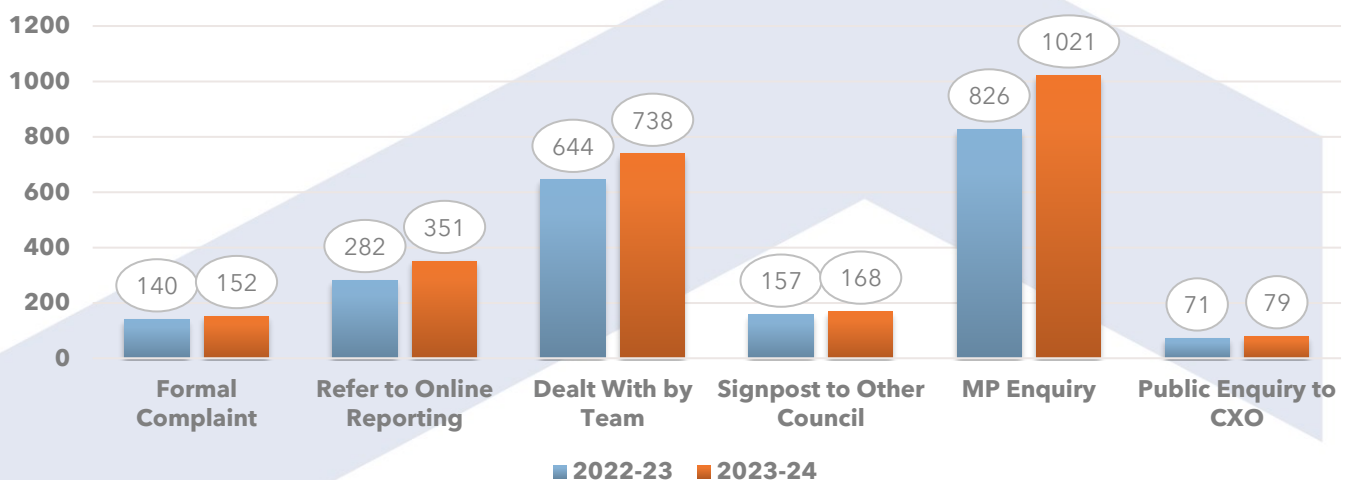
Method of Contact









Categories of Feedback Received

The chart below provides data on how we have categorised feedback that has been received during 2023-2024.

Corporate Categories 2023-24

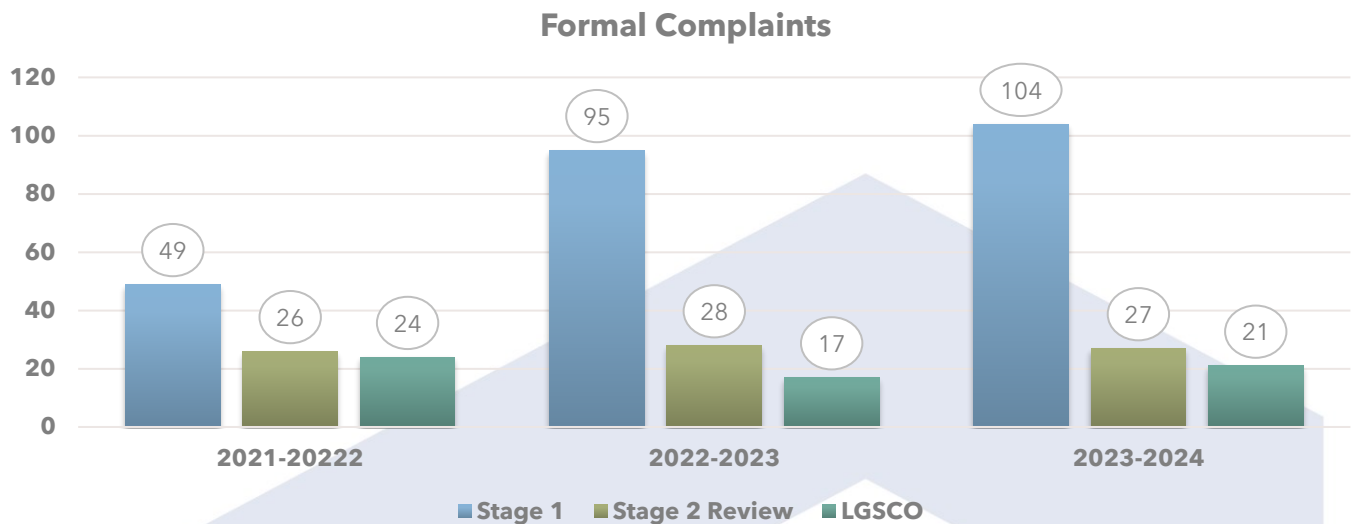


Comparison With Previous Reporting Period

Formal Complaints		8.5%
Refer to Online Reporting		24.4%
Dealt with by Team		14.5%
Signpost to Other Council		7%
MP Enquiry		23.6%
Public Enquiry to CXO		11.2%

Formal Complaints

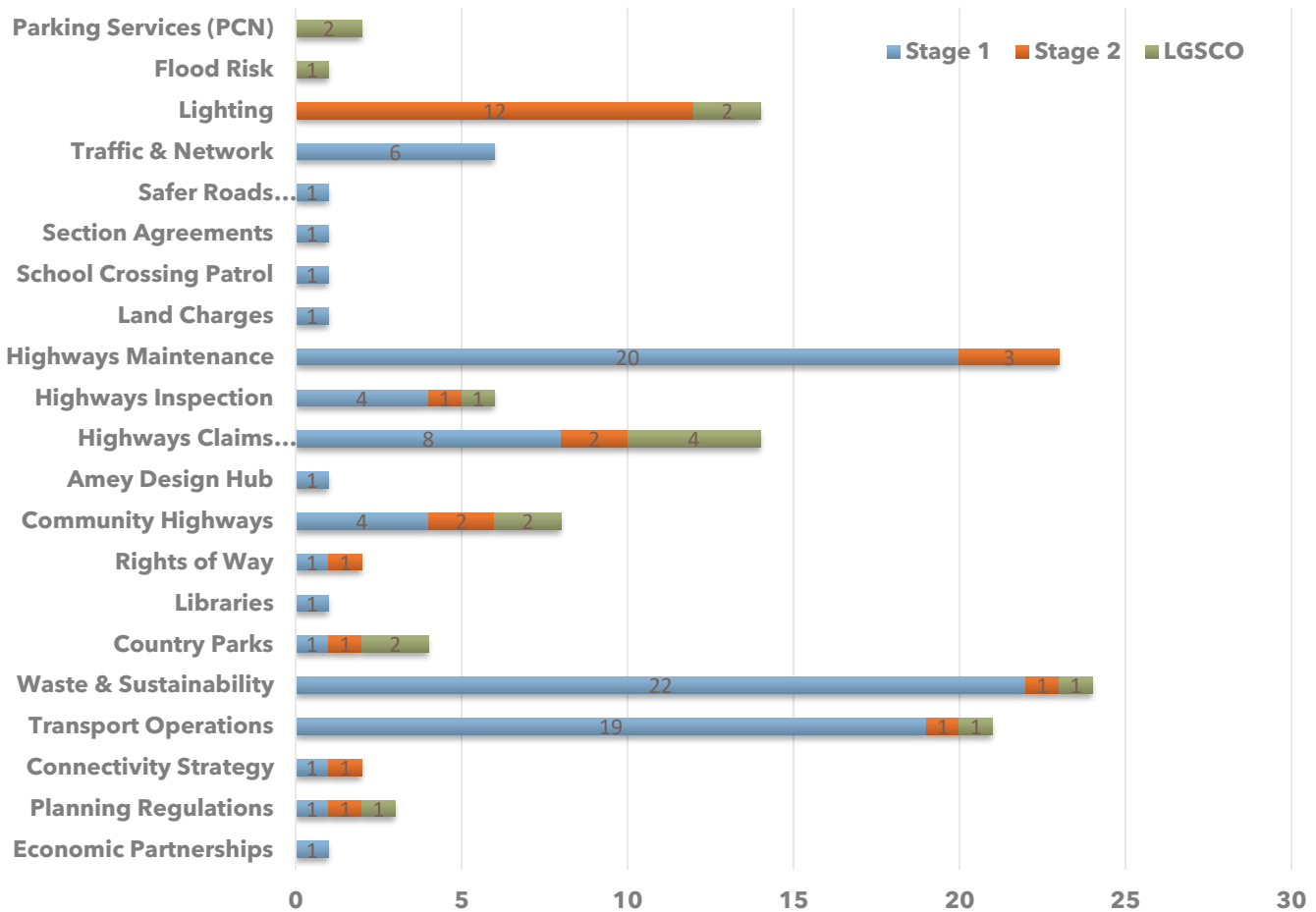
The chart below provides information on the number of Stage 1 complaints conducted during 2022-23 together with the number of Stage 2 Review requests and Local Government and Social Care Ombudsman contacts during this period.



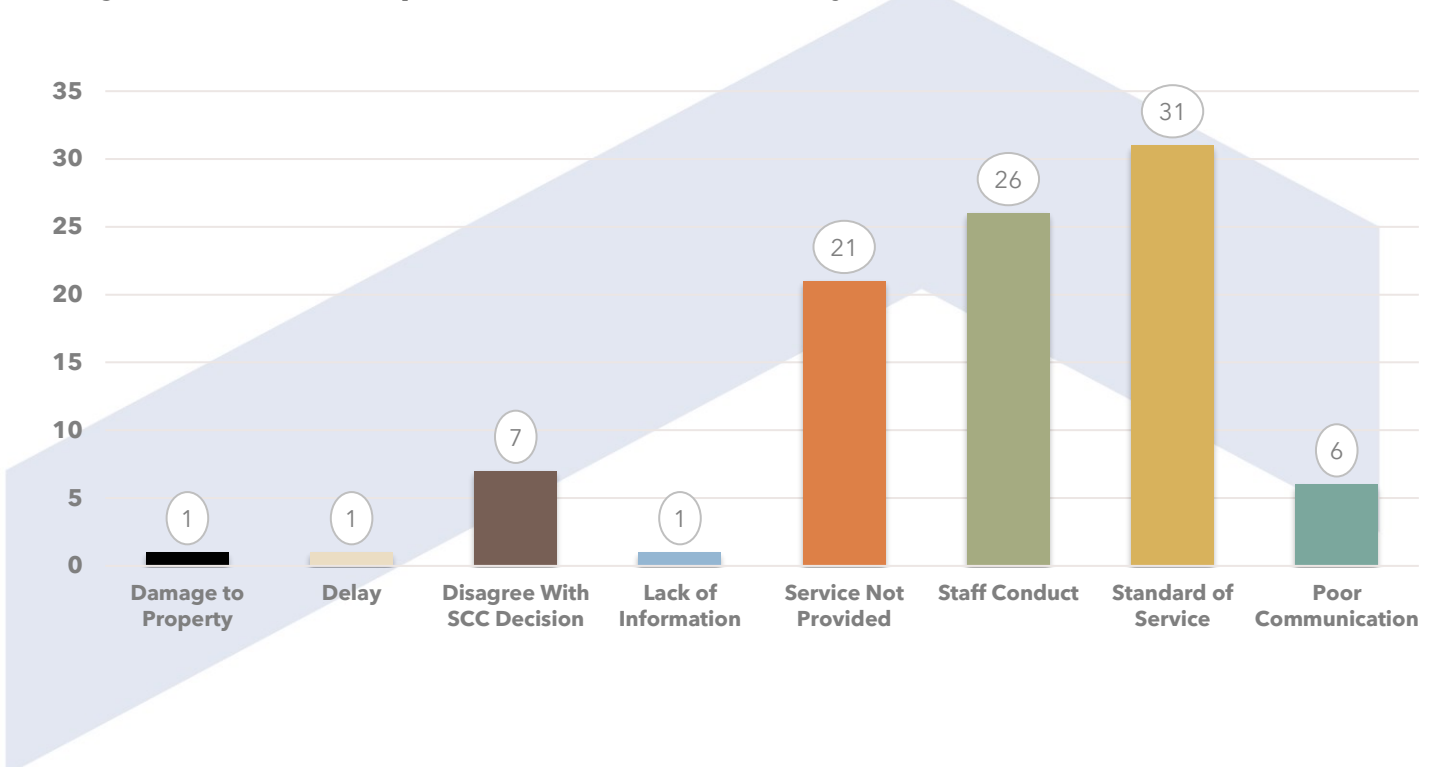
2022-2023	Stage 1	Stage 2 Review Requests	LGSCO Contacts
Economy, Infrastructure & Skills	94	Stage 2 Review - 25 Stage 2 Refused - 1	Total Contacts - 17 Investigation - 3 Not Investigating - 14
Corporate Operations	10	Stage 2 Review Refused - 1	Total Contacts - 4 Investigation - 0 Not Investigating - 4
Total	104	27	21

Economy, Infrastructure & Skills

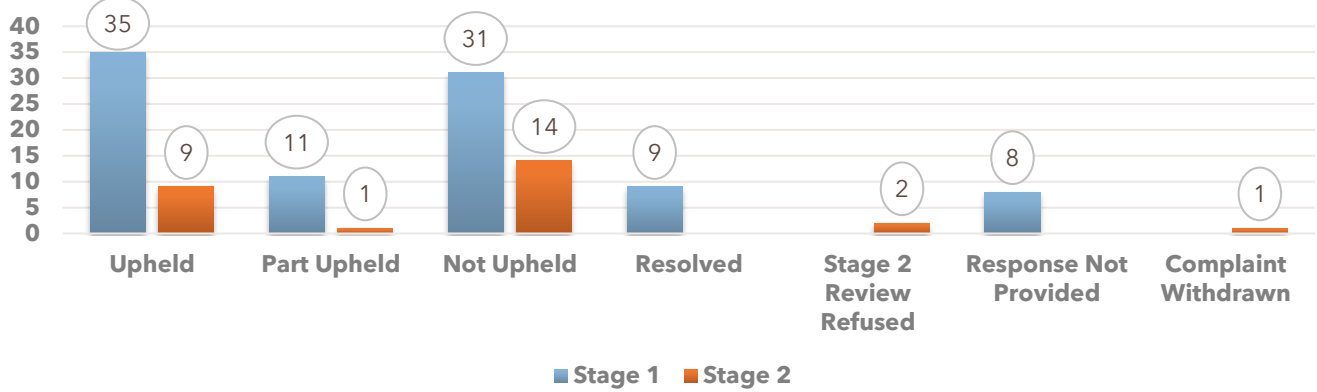
Number of Complaints by Directorate Team - E, I & S



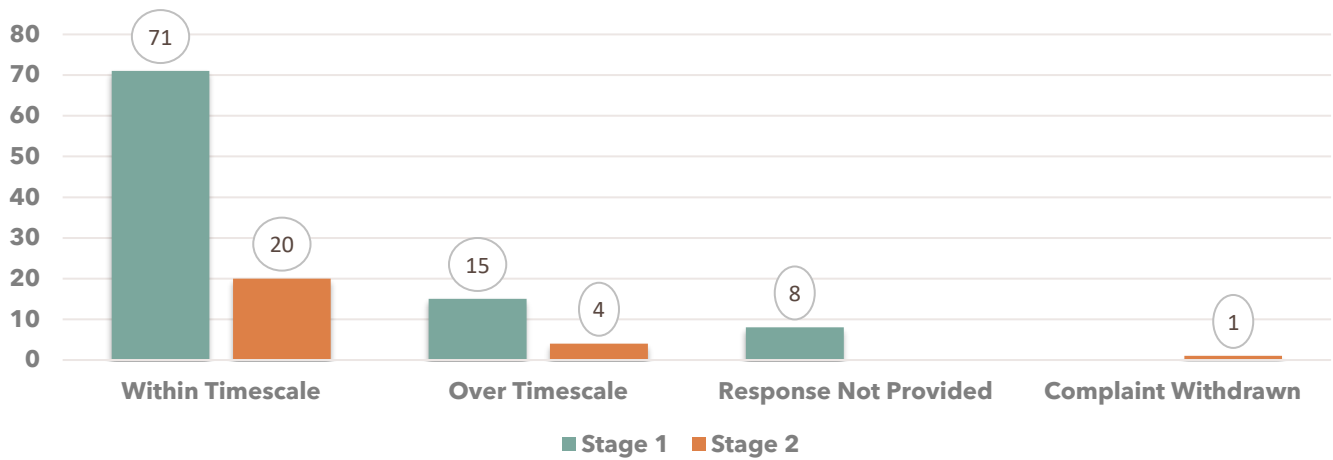
Stage 1 Nature of Complaint - Directorate Summary - E, I & S



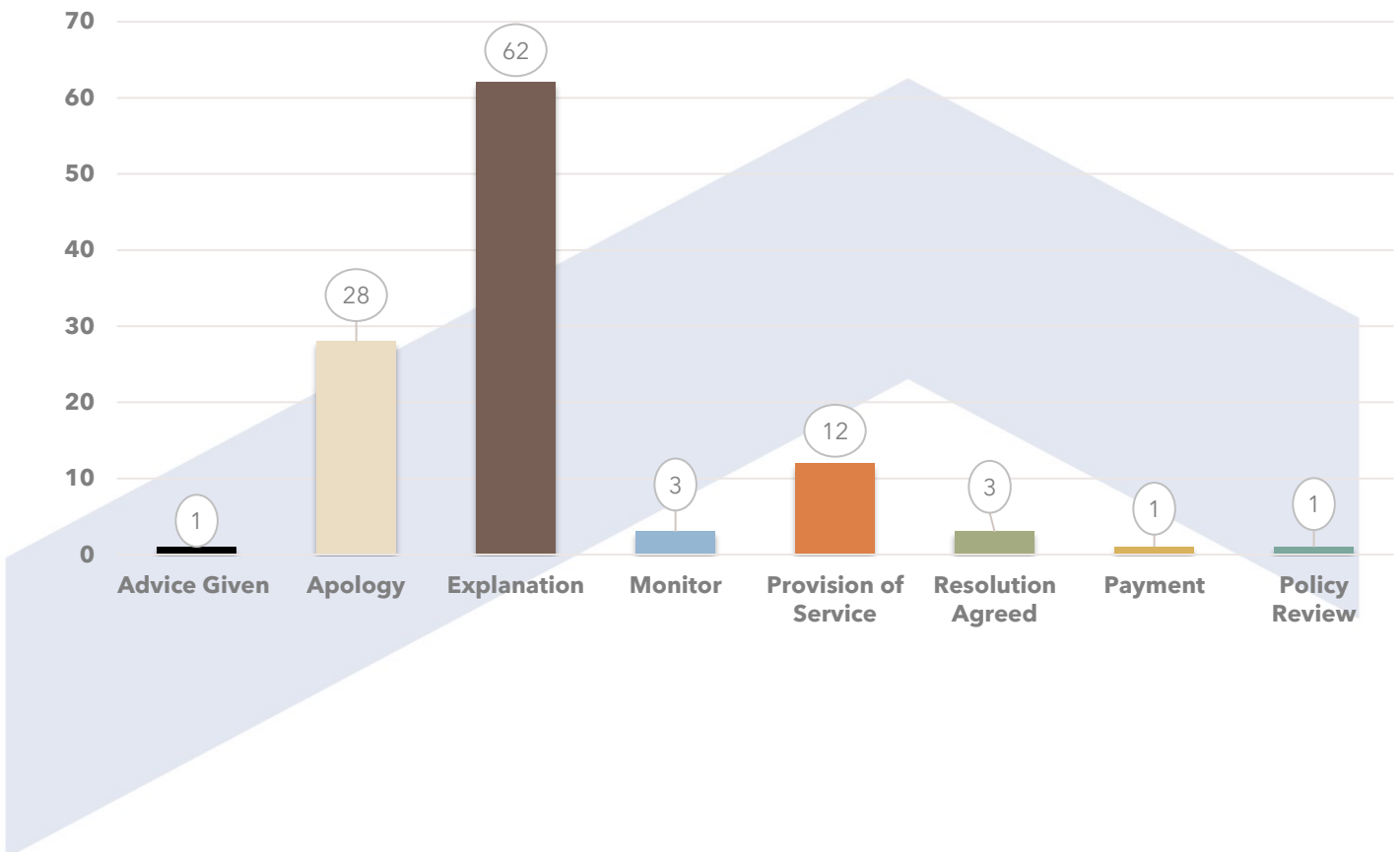
Investigation Outcomes - Directorate Summary - E, I & S



Timescales - Directorate Summary - E, I & S



Remedy - Directorate Summary - E, I & S



Examples of Learning Actions - Directorate Summary - E, I &S

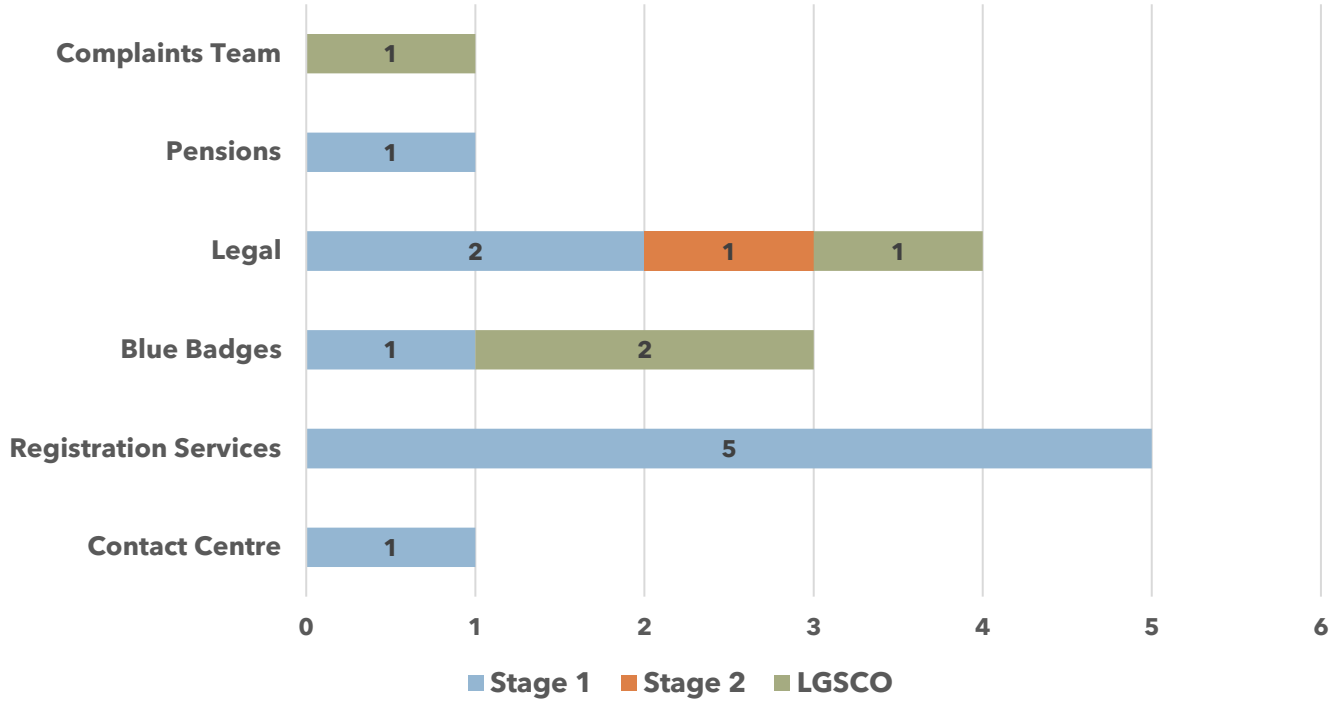
- Complaint has raised awareness that the policy for Disabled Person's Parking Bays is in need of review and the information on the website needs to be updated. The application process itself is currently being reviewed as part of wider customer service improvements and this will include the functionality for customers to add any additional pertinent information, such as the construction of an access ramp within the available garden space. Training will also be provided to the relevant teams on the provision of clearer responses to applications from customers.
- Review how expertise for highway drainage issues can be utilised much earlier in the journey customers experience, when they report highway flooding issues. Complaint details will be shared with Delivery Project Team for Routine/Reactive Highway Operations and Inspections, as well as other working groups currently involved in improving customer experience.
- The Council will consider whether a review of processes is required in relation to advice/call handling for highway flooding issues via the Council's Customer Service Centre.
- Review arrangements and processes for handling customer enquiries/complaints/requests in relation to the public highway, where these are misdirected to the Flood Risk Management Team.
- Requests have been made regarding more personalised, detailed responses around electronic updates, customer contact and improving the customer experience.
- Review the level of staff resources available to investigate and respond to highway complaints.
- The officers involved in this matter are reminded of the Council's Corporate Complaints Guidance.
- Review the way that we ask for the information to support a bus pass application as well as what is asked. This should make it easier for people to apply for a bus pass.

Local Government and Social Care Ombudsman Contacts - Directorate Summary - E, I &S

Team	Number	Outcome
Planning Regulation	1	Closed After Initial Enquiries
Transport Operations	1	Closed After Initial Enquiries
Waste & Sustainability	1	Closed After Initial Enquiries
Country Parks	2	Closed After Initial Enquiries - 2
Community Highways	2	Not Investigating - Out of Jurisdiction - 1 Closed After Initial Enquiries - 1
Flood Risk	1	Investigation - Fault and Injustice - 1
Highways Claims Process	4	Premature Complaint - 1 Not Investigating - Out of Jurisdiction - 3
Highways Inspection	1	Investigation - Fault and Injustice - 1
Parking Services (PCN)	2	Not Investigating - Out of Jurisdiction - 2
Lighting	2	Closed After Initial Enquiries - 1 Investigation - Fault and Injustice - 1

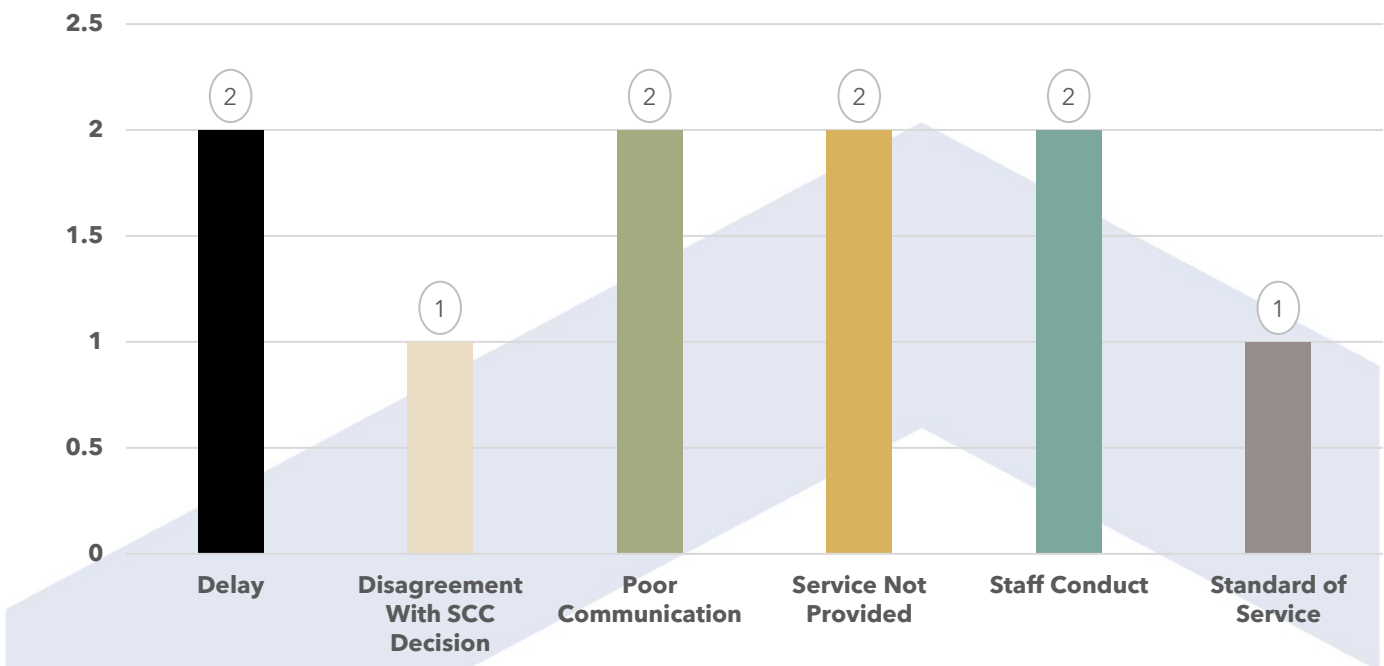
Corporate Operations

Number of Complaints by Directorate Team - Corporate Operations



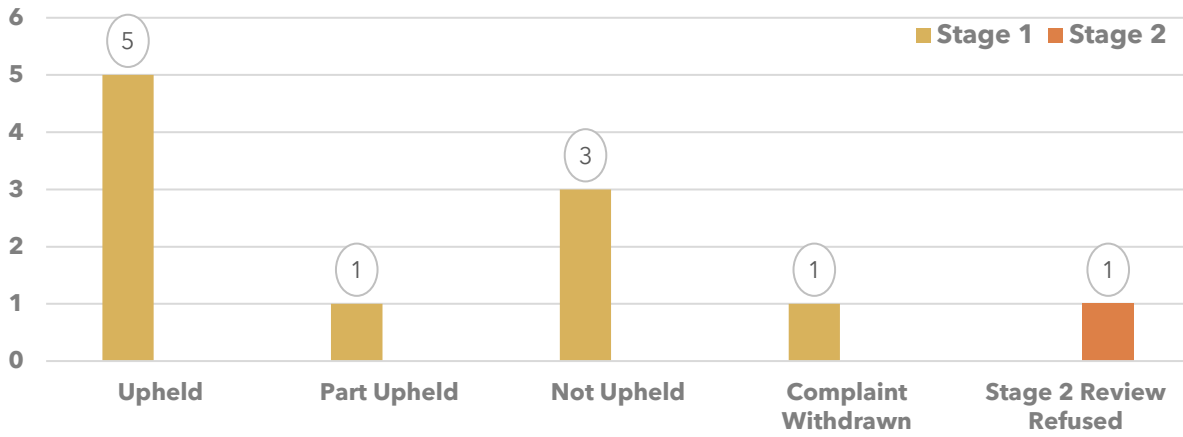
*Registration Services - 1 Complaint Withdrawn

Stage 1 Nature of Complaint - Directorate Summary - Corporate Operations

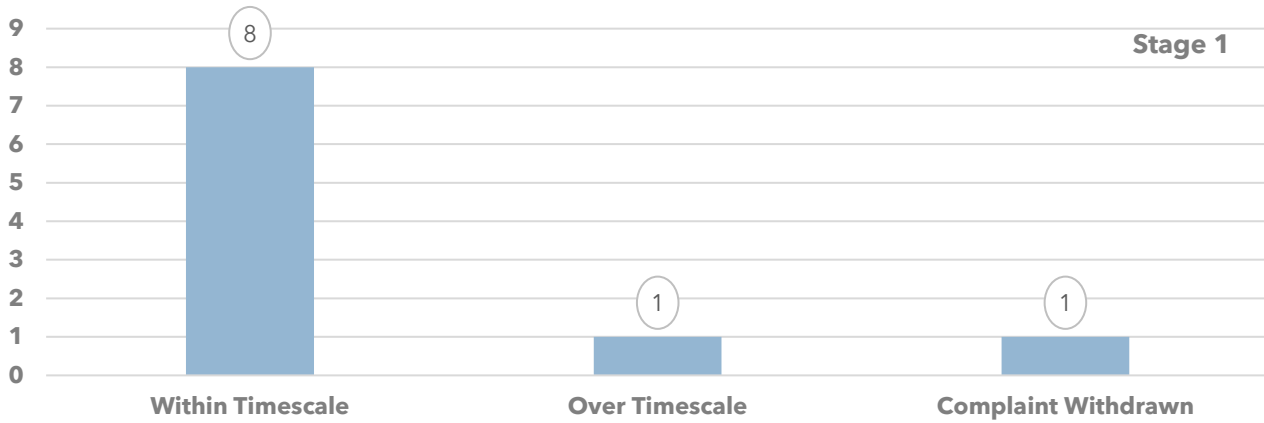


*Staff Conduct - 1 Complaint Withdrawn

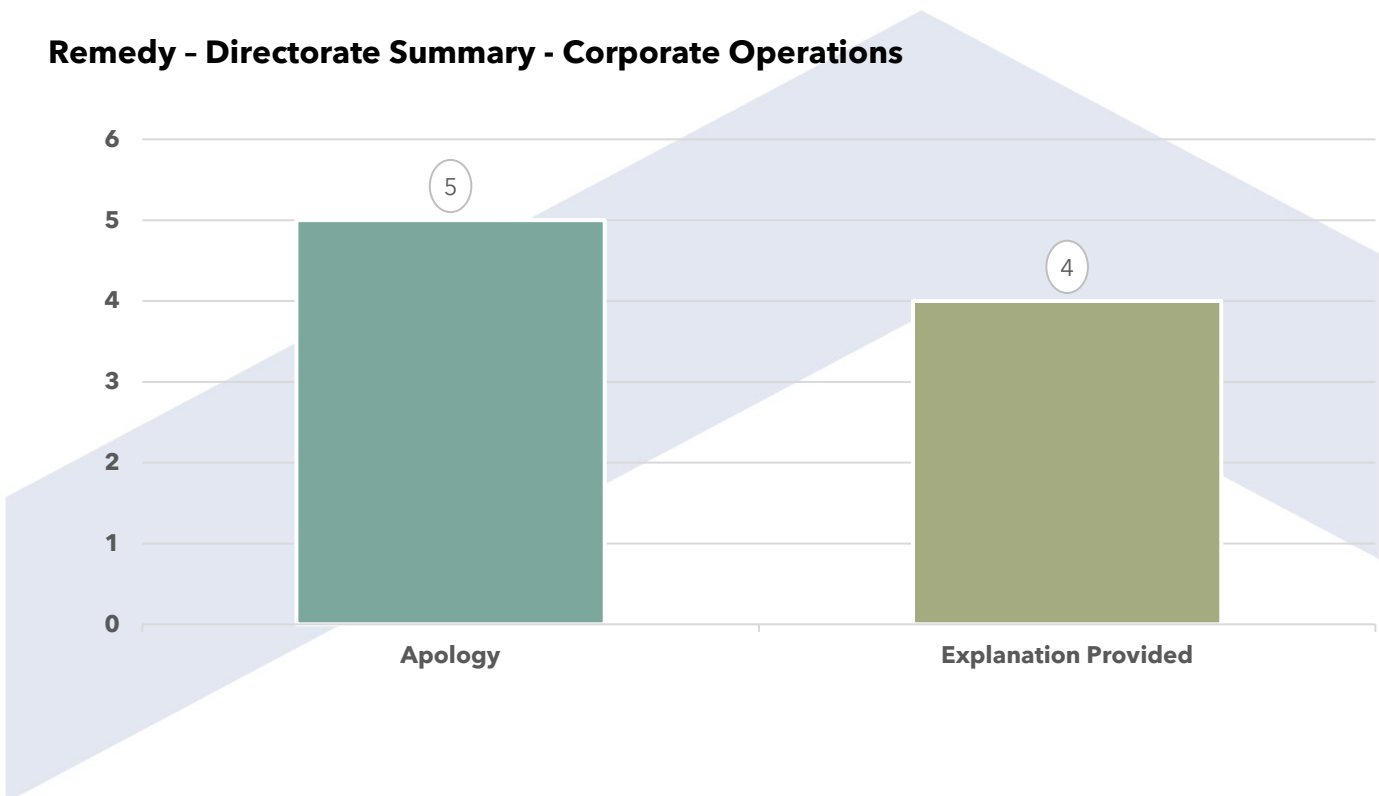
Investigation Outcomes - Directorate Summary - Corporate Operations



Timescales - Directorate Summary - Corporate Operations



Remedy - Directorate Summary - Corporate Operations



Examples of Learning Actions - Directorate Summary - Corporate Operations

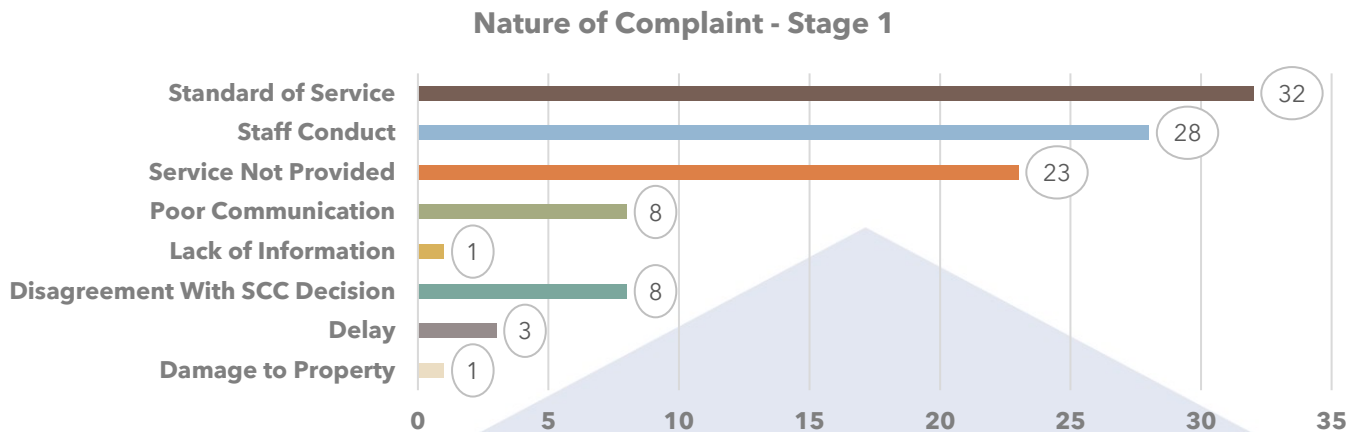
- Discussion with staff regarding the importance of ensuring the correct information is always provided. Additional guidance has been provided if queries arise in which they are unsure or require further clarification.
- Reviewed the importance of ensuring people are fully informed as to any delay in which they may incur in the instance we experience any future system related issues with all registration offices involved.
- We will provide feedback to the customer service advisor to ensure that they are accessing our policies and procedures documents to confirm their understanding for every registration call which will be closely monitored and reviewed by their supervisor.

LGSCO Contacts - Directorate Summary - Corporate Operations

Team	Number	Outcome
Legal Services	1	Closed After Initial Enquiries
Complaints Team	1	Not Investigating - Out of Jurisdiction
Blue Badge	2	Closed After Initial Enquiries - 2

Overview of Stage 1 Complaints

The below chart illustrates the nature of complaint received under Stage 1 of the Corporate Complaints Procedure.



55.7% service-related issues

- Delays in the highways claims process
- No response to request for provision of grit bin
- Reports of blocked drains causing flooding to property not acted on and delays in carrying out remedial works
- Conditions of walkways on Country Park
- Closure of public footpath impacting on local business
- Delays arranging transport for SEND child to school
- Delay in handling Definitive Map Modification applications

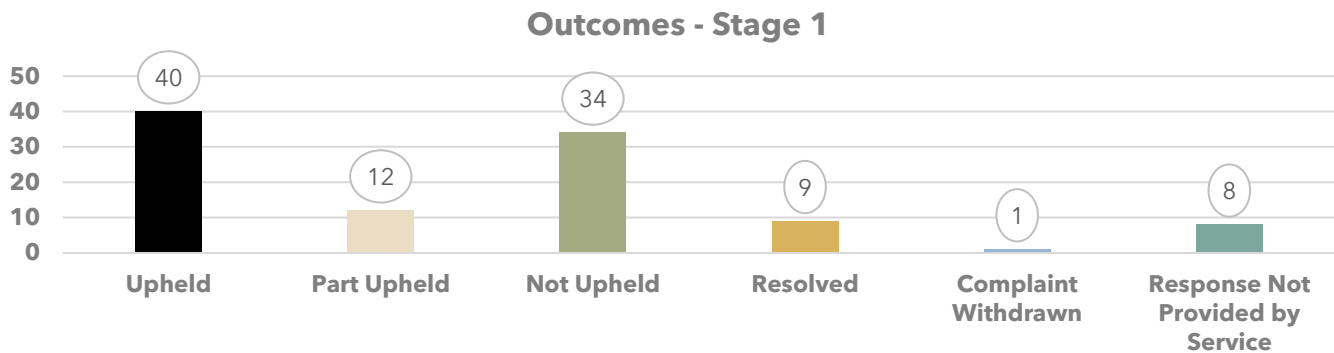
27% staff conduct

- Unhelpful staff when contacting the Council
- The way in which a formal complaint was handled by the investigating officer
- Lack of assistance provided during visit to HWRC

9% poor/lack of communication

- Lack of timely update regarding highways report
- No updates regarding transport arrangements for SEND child

The chart below shows the outcomes of Stage 1 complaints during 2023-24.



39% Upheld - increase on previous reporting period (36% - 2022-23)

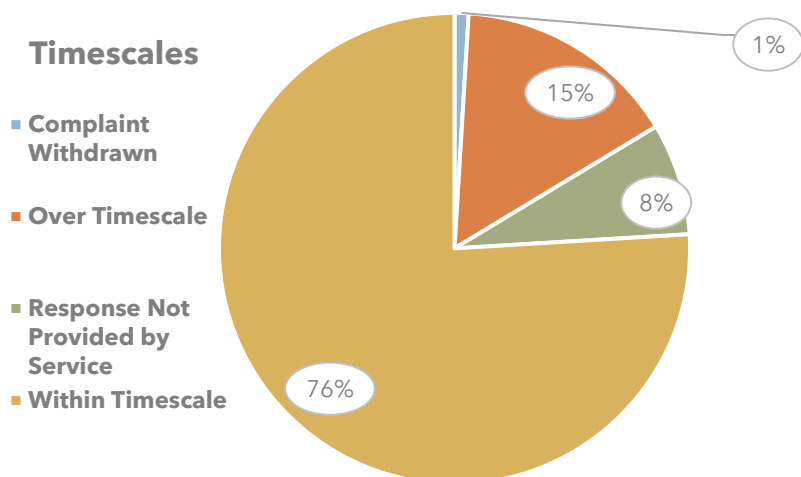
33% Not Upheld

8% No Written Response Issued

The chart below details the compliance rate in respect of responding to complaints within the 20-working day timescale:



76% of Stage 1 Complaints were responded to within timescale. This is a significant improvement in comparison with the previous reporting years figure of 56%



Overview of Stage 2 Reviews

	2020-21	2021-22	2022-23	2023-24
Number of Stage 2 Review Requests Received	20	29	28	27
Request for Stage 2 Review Granted	18	27	25	25
Request for Stage 2 Review Refused	10% (2)	7% (2)	11% (3)	8% (2)
Stage 2 Review - Upheld	5.5% (1)	14% (4)	25% (7)	34% (9)
Stage 2 Review - Partially Upheld	17% (3)	21% (6)	11% (3)	4% (1)
Stage 2 Review - Not Upheld	72% (13)	48% (14)	54% (15)	52% (14)

Service	Outcome
Planning Regulation	Not Upheld
Connectivity Strategy	Upheld
Transport Operations	Not Upheld
Waste & Sustainability	Upheld
Country Parks	Stage 2 Review Refused
Rights of Way	Complaint Withdrawn
Community Highways	Not Upheld - 1 Upheld - 2
Highways Claims Process	Upheld - 2
Highways Inspection	Not Upheld
Highways Maintenance	Not Upheld - 1

	Part Upheld - 1 Upheld - 1
Technical Services (Lighting)	Not Upheld - 9 Upheld - 3
Legal Services	Stage 2 Review Refused

Learning from Stage 2 Reviews

- The Council's lighting service provider, Eon, has been instructed to install a baffle at the back of the lantern to significantly reduces the amount of light emitted on the side it is located.
- Review of how additional information is requested in respect of bus pass applications.

Local Government and Social Care Ombudsman

The Ombudsman investigates complaints about the actions taken by or on behalf of a council or authority. The service is independent, free and impartial. The Local Government Act gives the Ombudsman the powers of the High Court to require the production of evidence or witnesses.

The main statutory functions for the Ombudsman are:

- to investigate complaints against councils and some other authorities
- to investigate complaints about adult social care providers from people who arrange or fund their adult social care (Health Act 2009)
- to provide advice and guidance on good administrative practice.

When investigating a complaint, the Ombudsman will look at whether there has been evidence of fault by the council and any injustice caused to the complainant. Following this the Ombudsman will recommend a proportionate appropriate and reasonable remedy to the complaint.

Enquiries - These instances are where the complainant has approached the Ombudsman with their complaint. The Ombudsman will then contact the Council to ask for further information to consider whether they will carry out a full investigation into the complaint. Should the Ombudsman decide that they will not carry out a detailed investigation, the complaint will be closed.

Not Investigating - On occasion, the Ombudsman may receive a complaint that it will not investigate. Reasons for this can be as follows:

- Alternative legal remedy
- Insufficient fault of justice
- Complaint referred to the Ombudsman over one year after the incident subject of the complaint occurred

Investigation - An investigation will take place if the Ombudsman is of the view that the issues raised meet the tests set out in its Assessment Code. The Council will be advised of the investigation and the Ombudsman will specify what information it requires from the Council to

investigate the complaint. Once the investigation has been completed, Draft Decision will be issued, and the Council and complainant will be invited to comment on this. The Ombudsman will then issue its Final Decision Statement on the complaint which details its findings and any recommendations that it expects the Council to implement. This can include changes to procedure or practice and financial payment to the complainant.

A total of 21 contacts from the Ombudsman were received during 2023-24. Further details about these can be found in the tables below. The categorisation is based on the information provided by the LGSCO.

Closed After Initial Enquiries		
Team	Complaint	LGSCO View
Lighting	Installation of new lamps in the lights reduces lighting levels at night	Not enough evidence to indicate any fault
Country Parks	How a Council vehicle was driven during an event in a park	LGSCO unable to add anything further to the investigation carried out by the Council
Transport Operations	Conduct of passenger assistant on transport	Premature complaint - referred back to Council
Legal Services	Delays in processing village green application	Not enough evidence to indicate any fault
Highways	Handling of highways repairs	Alternative procedure available and not enough personal injustice
Local Events	Impact of event on parking	Not enough evidence to indicate any fault
Blue Badges	Decision not to award Blue Badge	Investigation would be unlikely to find fault with the Council's actions.
Waste	Disagreement with Van Permit	No sign of fault by the Council and there is nothing to add to the response the Council has already provided via its own investigation.
Blue Badges	Application for Blue Badge not considered properly	Not enough evidence of fault to justify investigating.
Planning regulation	Visual impact not assessed properly during planning process	Insufficient evidence of fault in the Council's response to complaint

Not Investigating		
Team	Complaint	LGSCO View
Highways	Failure to properly maintain the public highways	Alternative process available - complainant can serve notice on the Council and take the matter to court
Parking (PCN)	Failure to respond to correspondence about a penalty charge notice.	Not enough evidence of fault Alternative process available - Complainant can appeal to Traffic Penalty Tribunal
Complaints Team	That the Council failed to respond to request to remove contact restrictions	Complaint is out of time
Highways	Damage to vehicle	Alternative process available - complainant can pursue compensation via court

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Parking (PCN)	Council's refusal to cancel eight PCN's	Alternative process available - Complainant can appeal to Traffic Penalty Tribunal

Investigating		
Team	Complaint	LGSCO View
Case 1 Highways	Failure to respond to report of fallen tree	Fault
Case 2 Lighting	Installation of streetlight affecting residential property and delayed testing light levels	Fault
Case 3 Flood Risk	Council failed to update flood risk management strategy and section 19 flood investigation reports	Fault

Recommendations:

Case 1:

- Apologise to Mr X
- Make a symbolic payment of £100 to reflect time and trouble clearing the tree.
- The Council is already reviewing its out of hours service as part of a wider programme no recommendations made for improvements to the service.

Case 2:

- Write to Mrs X and apologise for its delay in undertaking a light test and installing a light shield to the footpath light next to Mrs X's property and any inconvenience caused.

Case 3:

- Apologise to Ms X, within four weeks of my final decision for the delay in publishing the strategy and the frustration this has caused.
- Within four weeks of my final decision, make a written commitment to publish the updated strategy by the end of January 2024 as it suggested.
- The Council should make a written commitment that, in the event it decides a further review of its strategy is necessary, it will explain its intentions and the likely timeframes on its website and deliver accordingly.

The Local Government and Social Care Ombudsman issue an Annual Review Letter each year. The Annual Review for Staffordshire County Council 2021-22 together with useful data in respect of Ombudsman Decision can be found at [Your council's performance \(lgo.org.uk\)](https://lgo.org.uk)

Comparison with Previous Years:

	2023-24	2022-23	2021-22	2020-21
Number of Decisions	161	117	115	105

Number of detailed investigations*	52	49	46	40
Adults	16	14	11	15
Children and Families	32	27	17	21
Corporate	4	8	3	4
Upheld Decisions For Detailed Investigations	48 (92%)	35 (71%)	31 (67%)	37 (92.5%)
Compliance with Ombudsman Recommendations	100%	100%	100%	100%

* Detailed Investigation - Where a finding of upheld or not upheld is issued

** Number of decisions is higher than number of contacts due to a decision being made in 2023-24 for a contact that was received in the previous reporting period

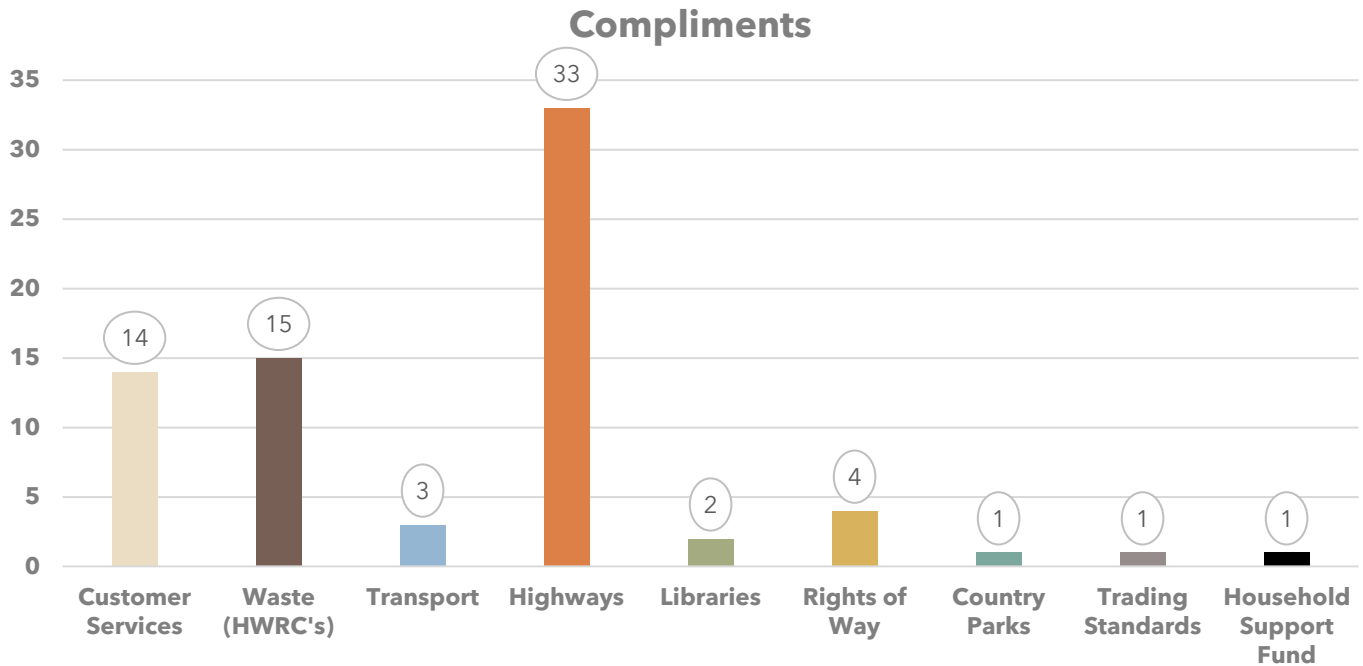
- The Ombudsman received 160 contacts regarding Staffordshire County Council during 2023-24. This is an increase of 37.6% in comparison with the previous years total contacts
- Of the 161 decisions made by the Ombudsman, the data shows that (52) 33% progressed to a detailed investigation
- Of the detailed investigations carried out by the Ombudsman 92% were upheld. This is a significant increase in the finding of fault
- 47 of the detailed investigations resulted in remedies being identified
- The Ombudsman made service improvement recommendations in 23 of the 48 detailed investigations
- The Council has achieved a 100% compliance rate with the Ombudsman's recommendations for service improvements
- 50% of the remedies were completed late

- 49 contacts were closed after initial enquiries had been made with the Council. To assist the Ombudsman, the Council is required to provide extensive documentation and file records for the Investigator to consider prior to making a decision on whether to carry out a detailed investigation

Compliments

Positive feedback about a service or member of staff can be made in a number of ways such as our online form, by email or directly to a member of staff. We record compliments that show a level of service or actions that go above what would normally be expected. Compliments are only logged if the positive feedback is made by a member of the public.

74 recordable compliments were received during 2023-24.



- My wife and I would like to pass our appreciation and thanks to your Customer Services Assistant who exceeded our expectations in trying to help us resolve a query. She did everything to help us. Would you please pass our gratitude to her
- I would like to praise the Uttoxeter household recycling centre staff, they are extremely helpful and friendly. Equally they are continually helping, advising and tidying rather than standing around they are a credit to the Council.
- I reported dangerous potholes. Within 5 days they were repaired and the team doing it were efficient and very helpful on our very narrow access difficult lanes. Very well done and thank you
- Some months ago, all the streetlights in the vicinity were replaced. Wow!! They are amazing! The light pollution has so noticeably reduced. We can actually stand outside now and see the stars. Now I imagine they are actually designed to reduce light pollution for the benefit of wildlife. Well it's worked. Since the lights have been changed we are seeing foxes and hedgehogs. We have lived in our house for 16 years and we have never seen a fox on our drive before! Delighted! Thank you our Highways Dept
- Reception staff went out of their way to support with a blue badge application. It would have been so easy to just send an email to say reapply but they talked me through what I needed to do and also ensured everything got processed quickly. They also called me as I had an additional query and let me know when everything was sorted out. As a carer I always feel like I am having to battle on my own just to get my daughter the additional supports and adjustments she needs and it was just so lovely to feel like they were there to support me today. Honestly couldn't have wished for a better outcome so thank you so much

- More complaints were upheld this reporting year than the last one - 39% in 2023-24 vs 36% in 2022-23
- The number of Stage 1 complaints received in 2023-24 went up, but the outcome of Not Upheld stayed the same as the figures from previous years.
- Stage 1 investigations are still generating useful learning actions and suggestions. This shows that complaints are an effective way to bring about improvement and better results for residents.
- As a service that impacts every resident in the county, highways are the most common subject of complaints corporately.
- We have improved slightly regarding providing a written response to the complaint. However, even if we address the issue, a written response gives us a documented record of how we investigated the complaint and what we found out, including how we resolved it and what we learned. Without a written response, we cannot keep track of this information and share it for wider learning purposes.

Stage 2 Reviews

- There has been an increase in the number of Stage 2 Reviews that have determined an outcome of upheld. This demonstrates that it is important for complainants to have access to a mechanism that can review the Stage 1 response to their complaint if they feel that it has not been investigated properly.
- A few learning actions have emerged from Stage 2 Reviews that have been resolved, but sometimes a complaint can be resolved without finding any process issues that led to the complaint.

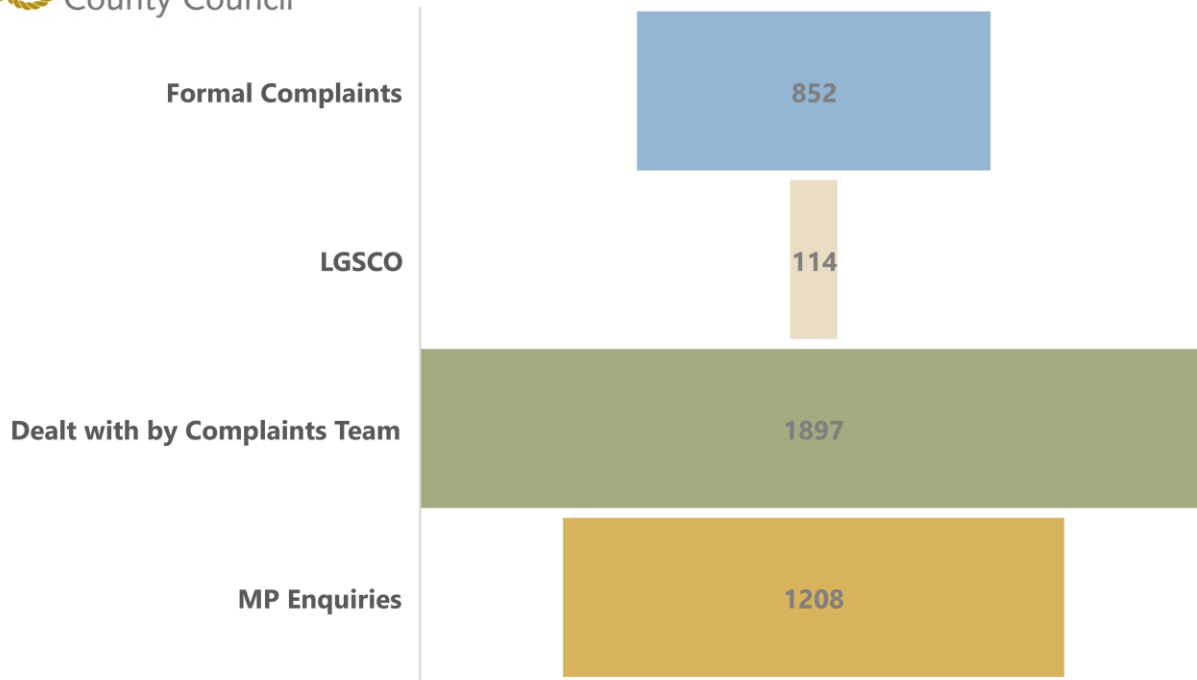
Local Government and Social Care Ombudsman

- There has been a slight increase in the number of Ombudsman contacts during 2023-24 however out of the 21 that were received, only three progressed to an investigation.
- The Council has agreed with the recommendations made by the Investigator and has successfully completed the recommendations within the stipulated timescale.
- One payment of £100 has been made in recognition of time and trouble experienced by the complainant.

Complaints Team

Overview of Team Activity 2023-24

The chart below shows the total number of complaints (Adults Social Care, Childrens Social Care and Corporate) and other contacts dealt with by the Complaints Team during 2023-24.



Team Development

- Procured Case Tracker which is a bespoke customer service specialist database. This new system will improve the recording and monitoring of complaints and will also be able to produce real time data for service leads
- Taking part in the Local Government and Social Care Ombudsman pilot in respect of the new Complaints Handling Code. The code has been produced as guidance on what an effective a corporate complaints procedure should look like and local authorities are expected to adopt the framework set out in the guidance.

