
Report To: Policy and Resources Committee **Date:** 31 March 2009

Report By: Corporate Director
Improvement and Performance **Report No:** POL/16/09/PW/SW

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Subject: InForm – A Corporate Comments, Compliments and Complaints
Framework for Inverclyde Council

1.0 PURPOSE

1.1 The purpose of this Report is to update members on the development and implementation of InForm – a Corporate Comments, Compliments and Complaints Framework for the Council.

2.0 SUMMARY

- 2.1 A need has been identified to establish a corporate system for logging, managing and monitoring comments, compliments and complaints within Inverclyde Council. At present although there is good practice in certain areas of the Council this is not the case across the entire organisation. Statutory complaints systems are also in place in some services which work very well.
- 2.2 However there is no corporate system in place utilised by all services - there is a need to replace the existing ad hoc arrangements with single corporate approach.
- 2.3 The Council must establish a framework that provides an effective corporate system for dealing with comments, compliments and complaints and use the information gained to help drive forward improvements to services and to better meet the needs of customers.
- 2.4 InForm (Appendix 1) has been developed in parallel with the Customer Service Review undertaken by NCC as part of the Modernisation and Efficiency Programme. Chief Officers and other relevant officials have been consulted and have contributed to the finalised document, prepared by Corporate Communications and Public Affairs.
- 2.5 InForm addresses comments, compliments and complaints across the Council and takes into consideration the statutory elements of complaints within specific services.
- 2.6 The introduction of a corporate approach to comments, compliments and complaints will allow for the management of information across all services and allow for update reports to be prepared for the Policy and Resources Committee. These will include the monitoring and reporting of statistics from InForm to help the Council identify potential areas of concern or good practice and use these to improve service delivery.
- 2.7 Once agreed InForm will become active from 1 April 2009. An Implementation Plan has been prepared that will involve briefings to Heads of Service and other relevant officers, briefings for Elected Members and a publicity campaign to raise awareness of the new policy both externally and internally including new leaflets and posters for the public.

3.0 RECOMMENDATION

3.1 It is recommended that the Committee:

- a. agree the implementation of InForm across all services from 1 April 2009; and
- b. agree that monitoring information generated from InForm will be reported on a regular basis to Committee.

Paul Wallace
Corporate Director
Improvement and Performance

4.0 BACKGROUND

4.1 The Corporate Communications Framework was approved in November 2007 to implement an effective way to address the reputational issues affecting Inverclyde in general and Inverclyde Council in particular.

4.2 The Framework outlined the key strategic priorities for Inverclyde Council from a communications perspective, broken into three main areas:

- Our Reputation
- Our People
- Our Relationships

It also had a detailed Action Plan for implementation which included the development and implementation of a Corporate Comments, Compliments and Complaints Framework. InForm addresses the requirement identified within the Corporate Communications Framework.

5.0 The purpose of the policy is to establish a framework that will enable the Council to have an effective corporate system for dealing with comments, compliments and complaints and to use the information gained to help drive forward improvements to services and to better meet the needs of customers.

5.1 All local authorities need to make use of feedback from customers and systematically use feedback from comments, compliments and complaints to improve services. Introducing InForm will enable Inverclyde Council to have an effective corporate system which will enable us to identify areas of good practice or improvement.

5.2 InForm has been developed in the context of the Customer Service Review undertaken by NCC last year as part of the Modernisation and Efficiency Programme.

5.3 Corporate Communications and Public Affairs has overall responsibility for the handling and monitoring of complaints at the corporate stage within Inverclyde Council.

5.4 Comments and Compliments are easily facilitated within the system and will be passed to the service concerned for attention. In terms of complaints, InForm outlines a Four Stage Process as follows:

1. Complaint handled by relevant council service
2. Complaint escalated to the Head of Service
3. Reviewed by Corporate Communications and Public Affairs on behalf of the CMT.
4. Complaint referred to the Scottish Public Services Ombudsman.

In each stage a pro forma letter will be produced to make it clear to the complainant which stage of the process they are at and what their options to progress their complaint. This will ensure that the process is followed in full and that premature complaints are not made directly to the Chief Executive, for example.

InForm outlines the role of Elected Members in the complaints process and also outlines those exceptions which will not be subject to the process.

6.0 IMPLICATIONS

- 6.1 Finance: InForm will be delivered within the existing Corporate Communications and Public Affairs budget
- 6.2 Personnel: None
- 6.3 Legal: None
- 6.4 Equalities: Equality and diversity processes and procedures are embedded within the Corporate Communications Framework.

InForm will be subject to a full Equality Impact Assessment which will be available on the Council website or in hard copy by request.

7.0 CONSULTATION

- 7.1 Consultation on InForm has taken place with the CMT, Heads of Service and other relevant officers of the Council. Examples of good practice were found by consulting with a number of other local authorities and public sector agencies including the Scottish Public Services Ombudsman.

8.0 List of Background Papers

- 8.1
- InForm – a Corporate Comments, Compliments and Complaints Framework for Inverclyde Council
 - Implementation Plan

InForm – A Corporate Comments, Compliments and Complaints Framework for Inverclyde Council

1. Introduction

- 1.1 This policy framework outlines in broad terms the Council's intended approach to the management of comments, compliments and complaints.
- 1.2 The purpose of the policy is to establish a framework that will enable the Council to have an effective corporate system for recording and monitoring comments, compliments and complaints and to use the information gained to help drive forward improvements to services and to better meet the needs of customers.
- 1.3 This document has developed in the context of the Customer Service Review undertaken as part of the Modernisation and Efficiency Programme. It is intended that InForm will further develop once the new customer service model has been implemented. The customer service model is intended to fundamentally change the way in which the Council's customers make contact with the Council and request information or services.

2. Why do we need a corporate comments, compliments and complaints framework?

For the purposes of clarity the following definitions should be used:

Comment:

A comment made about a Council service that is not seeking further action but is merely for the information of the relevant service. This may include suggestions for improvement in a particular area or ways in which the Council can enhance its service in an area.

Compliment:

A notification of satisfaction or contentment with a Council service. This may take the form of passing on thanks for a job well done by a Council employee or a service delivered.

Complaint:

An expression of dissatisfaction, however made, about the standard of service, action or lack of action by the Council, its staff or contractors. This **does not** include a request for service where a contact made by a customer is asking for a service to be carried out e.g. bin uplift missed, gritting of roads etc, or is a normal enquiry.

- ♦ A need has been identified to establish a corporate system for recording and monitoring comments, compliments and complaints within Inverclyde Council. At present there are pockets of good practice in certain areas of the Council but no centralised approach. Statutory complaints systems are also in place at some Council services which work very well and the new framework must incorporate how these fit into the corporate picture.

- ◆ Organisations need to make use of feedback from customers and systematically use feedback from comments, compliments and complaints to improve services and identify good practice.
- ◆ Introducing a corporate comments, compliments and complaints framework will enable Inverclyde Council to have a highly effective corporate system for dealing with complaints and enable us to address areas for service improvement.

2.1 InForm outlines how we will:

- ◆ Implement the framework
- ◆ Increase awareness of our comments, compliments and complaints procedures both externally and internally
- ◆ Record and monitor comments, compliments and complaints
- ◆ Measure customer satisfaction with comments, compliments and complaints
- ◆ How we will inform our customers of changes made to services as a result of InForm

3. How will we implement the framework?

- 3.1 To enable us to roll out InForm across the Council it is important that each service nominates a Customer Liaison Officer(s) that Corporate Communications and Public Affairs (CCPA) can liaise with and who will be responsible for implementing the framework within their service. Relevant employees will be briefed and trained on how InForm works through a series of briefings.
- 3.2 We will establish a Corporate Steering Group that would have responsibility for developing and implementing the Council's framework.

4. How will we increase awareness of InForm?

- 4.1 A leaflet will be developed which will provide customers with all the information they require about how to make a comment, compliment or complaint about Council services. The leaflets will be available in all Council buildings and will also be able to be downloaded via the Council website as a printable pdf file.
- 4.2 The leaflet will contain the following information:
- The standards our customers can expect from us
 - How to make a request for service
 - How to make a comment, compliment or complaint about a Council Service
 - How to make a specific comment, compliment or complaint about Education or Social Care matters.
 - Outline of the process and timescale for complaints handling
- 4.3 It is essential that our customers can understand the information contained within this leaflet. We are also committed to ensuring that InForm meets equality and diversity requirements. InForm will be subject to a full Equality Impact Assessment which will be available to view on the Council website or on request.
- 4.4 A form will be developed for our customers to make comments, compliments or complaints about a service they have received. This form will be available on request from Council front offices or via post.

- 4.5 This form will contain a field for the customer to fill in asking them what action they would like to see taken as a result of their comment, compliment or complaint. Obtaining this type of information will help us to deliver customer focused services.
- 4.6 Copies of the form will also be available as a printable pdf on the Council's website. However, it is important to note that an electronic version will also be available on the website that will allow customers to fill it in online and submit it electronically.
- 4.7 To further promote our customer complaints process Corporate Communications and Public Affairs will produce a poster, which will outline how customers can make a comment, compliment or complaint. The posters will be displayed at all offices.
- 4.8 Customer Liaison Officers in each of the services will have responsibility for the notification of the number of leaflets/posters required by their service. Customer Liaison Officers will also have responsibility for ensuring that leaflets and posters are displayed in all public offices under their remit.

5. Comments and Compliments

- 5.1 All comments and compliments should be treated on their own merits by services. Compliments should be made known to the relevant Head of Service, who should make the letter and reply available to the people or service whose work is being complimented.
- 5.2 Statistics on the number and nature of comments and compliments received should be recorded and reported where relevant to the relevant strategic committee of the Council for noting.
- 5.2 It is important that comments and compliments are handled in an effective way and be considered in a consistent manner similar to complaints as they provide equally important information to the Council.

6. Complaints

- 6.1 Complaints may be received by telephone, e-mail, letter, or in person. Once it has been established that the complaint is not a comment or request for service we will apply the following judgements:
- Ensure complaint is passed to the relevant service
 - If possible, attempt to resolve complaints made in person at a Council Office or by telephone there and then.
 - Otherwise, acknowledge receipt of the complaint within **three working days** using the method preferred by the complainer. The default position should be either an e-mail or letter of acknowledgement. This should include a copy of the leaflet explaining the complaints process.
 - A full response to the complainer should be made within a timescale of **10 working days** where possible. If 10 working days is not possible for whatever reason, the complainer must be contacted within that same timeframe to explain the reason for the delay and an expected timescale for a full response.
 - It is usual that any complainers need to provide us with their name and contact details so that the complaint may be processed, however, anonymous complaints should still be investigated by the relevant service and, if relevant, processed through the Whistleblowing policy. *(The Council's Whistleblowing Policy forms part of the Employees Code of Conduct. It provides a confidential reporting framework through*

which employees and members of the public can express their concerns without fear of victimisation, subsequent discrimination or disadvantage. This is separate to InForm and is managed by the Council's Internal Audit function.)

- 6.2 Our complaints process consists of four key stages, the details of which are outlined below. It should be noted that Social Care and Education have separate complaints procedures which are outlined after the main stages below. However these procedures still generate the same management information which will be used to populate the centralised recording and monitoring system.

Stage 1

In the first instance the customer should contact the relevant Service or be directed to the relevant Service and briefly outline their complaint. This contact can be made by e-mail, by phone, in person, or in writing. This is a crucial stage and we would hope that most problems could be solved quickly and easily at this stage.

Once it has been established that the complaint is not a comment or request for service it should be recorded using the following details:

- Date and time of complaint
- Name(s) and contact details of complainer(s)
- Name of officer taking or receiving the complaint
- Brief outline of complaint
- Action being sought by complainer(s)

It should be highlighted that employees should make use of all options open to them to resolve a complaint. This may, for example, involve contacting the complainant to get further information, arranging for staff to visit the complainant or arranging for the complainant to meet with relevant staff to resolve at this stage.

The complaint, if not received or taken in person, must be acknowledged within three working days by the relevant service and a copy of this acknowledgement recorded against the complaint by:

- Date and time the acknowledgement was sent
- Name of person sending acknowledgement
- Copy of acknowledgement stored for records

An investigation to establish the facts on both sides should be undertaken by a relevant person in the service concerned. Thereafter, a full response should be sent to the complainer within a timescale of **10 working days** where possible. If 10 working days is not possible for whatever reason, the complainer must be contacted within that same timeframe to explain the reason for the delay and an expected timescale for a full response.

This resolution will either be an acceptance of the complaint and a suitable apology sent to the complainer or a rejection of the complaint.

In both cases the complainer should be informed that if they are dissatisfied with the outcome that they can write to the appropriate Head of Service, thus progressing the complaint to Stage 2.

Stage 2

If a complainer informs the Council that they are dissatisfied with the Stage 1 response, the Stage 2 procedure will be undertaken by the Head of Service.

Complaints received at this stage **must be in writing** and will be recorded as follows:

- Date and time of complaint received
- Name(s) and contact details of complainer(s)
- Name of Head of Service
- Brief outline of complaint
- Action being sought by complainer(s)

If the complainer, for any reason, is unable to submit the complaint in writing they should be given the opportunity to present themselves in person and for the complaint to be taken down in writing on their behalf.

The complaint must be acknowledged within three working days by the Head of Service and a copy of this acknowledgement recorded against the complaint by:

- Date and time the acknowledgement was sent
- Copy of acknowledgement stored for records

An investigation to establish the facts should be undertaken by the Head of Service. Thereafter, a full response should be sent to the complainer within a timescale of **10 working days** where possible. If 10 working days is not possible for whatever reason, the complainer must be contacted within that same timeframe to explain the reason for the delay and an expected timescale for a full response.

As in Stage 1, this resolution will either be an acceptance of the complaint and a suitable apology sent to the complainer or a rejection of the complaint.

In both cases the complainer should be informed that if they are dissatisfied with the outcome that they can write to the Head of Corporate Communications and Public Affairs, thus progressing the complaint to Stage 3.

Stage 3

If the customer is not satisfied with the response, they can ask for their case to be considered by the Head of Corporate Communications and Public Affairs on behalf of the Chief Executive and the Corporate Management Team (CMT).

The Head of Corporate Communications and Public Affairs will follow the same procedure in terms of recording the complaint as in Stages 1 and 2 and the acknowledgement of the complaint.

The Head of Corporate Communications and Public Affairs will then, in liaison with the relevant Corporate Director and/or Chief Executive, investigate the complaint. Thereafter, a full response should be sent to the complainer within a timescale of **10 working days** where possible. If 10 working days is not possible for whatever reason, the complainer will be contacted within that same timeframe to explain the reason for the delay and an expected timescale for a full response.

As in Stage 1, and Stage 2 this resolution will either be an acceptance of the complaint and a suitable apology sent to the complainer or a rejection of the complaint.

In both cases the complainer should be informed that if they are dissatisfied with the outcome that they can write to the Scottish Public Services Ombudsman, thus progressing the complaint to the final stage – Stage 4. Details of how to contact the SPSO will be given to the complainer.

Stage 4 - Scottish Public Services Ombudsman (SPSO)

If the complainer is still not happy with the outcome then they have the option of contacting the Scottish Public Services Ombudsman. The complainer would normally have to contact the Ombudsman within a year from the date that they found out about the matter, which is the subject of the complaint.

The Head of Corporate Communications and Public Affairs is the Council's main liaison point for the SPSO.

Complaints about a Head of Service, Corporate Director or the Chief Executive

Complaints about a Head of Service will be progressed by the relevant Corporate Director.

Complaints about a Corporate Director will be progressed by the Chief Executive.

Complaints about the Chief Executive will be progressed by the Council's Monitoring Officer (Head of Legal and Administration)

Complaints sent directly to Heads of Service, Corporate Directors of the Chief Executive

Heads of Service, Corporate Directors and the Chief Executive should ensure that any complaints received directly by them should be progressed through the Stages outlined above with no shortcuts put in place.

If, however, a Corporate Director or the Chief Executive responds personally to a complainer with a resolution, this will be considered to have immediately progressed the complaint to Stage 3 and a copy of all correspondence should be forwarded immediately to the Head of Corporate Communications and Public Affairs for recording. It is expected that the same process of acknowledging and recording the complaints is followed if a Corporate Director or the Chief Executive choose to become personally involved.

Education Complaints

Complaints against individual education establishments should be dealt with, in the first instance, by the Head Teacher before being escalated to the Quality Improvement Managers in Education Services. If no resolution is reached the complaint would be escalated to the Head of Service, thus rejoining the Council's procedures at Stage 2. Thereafter the complaint will follow the same corporate procedures.

All complaints should be fed into the corporate system to allow for accurate accounting.

Social Care Complaints

Social Care complaints follow a statutory process which is separate to the Council's corporate complaints process.

In summary the process involved is as follows:

- Officer receives complaint. Complaints record completed and countersigned by appropriate Service Manager.
- Complaints record sent immediately to Social Work Contract Monitoring and Complaints Team at Belville Street, Greenock.
- Acknowledgement sent to complainer within **5 days** along with a form outlining "*How Your Complaint is being Dealt With*"
- Service Manager allocates investigation to Complaints Officer in Social Care.
- Complaint investigation completed within **28 days** of receipt of complaint.
- Final response approved/signed by Service Manager and issued to complainer along with form outlining "*Our Response to your Complaint*".
- If response is to be longer than 28 days, Complaints Officer must agree the extension with the Service Manager of the Complaints Team
- If there remains no resolution the complaint is considered by the Chief Social Work Officer who will review the complaint within **14 days**, notify the complainer of the review outcome and issue a form "*Right to Appeal*".
- If the complainer remains dissatisfied they must notify the Chief Social Work Officer within 28 days and the matter will be progressed to the Complaints Review Committee
- Thereafter the matter is progressed to the Scottish Public Services Ombudsman

As in the Education system all complaints should be fed into the corporate system to allow for accurate accounting.

7. Elected Members

Elected Members are seen by many as the link to Council services and constituents may wish to make comment, give compliments to or complain about Council services via their councillor.

In this case, Elected Members should pass the comment, compliment or complaint to the relevant Head of Service. The Head of Service will then pass it to the relevant officer for investigation, beginning at Stage 1 of the process.

Elected Members should not become involved in the complaints process and should not be used as a recipient of correspondence in relation to the complaint. This should be made direct to the complainer. The Head of Service should inform the Elected Member once the matter has been dealt with to its conclusion, or been passed to the Ombudsman.

In the event of a complaint against an Elected Member, the matter should be dealt with by the Chief Executive.

8. Exceptions

Although it is intended to allow complaints to be dealt with under InForm there are a number of exceptions, as a result of other processes of review or statute.

These are:

- Complaints that are simply criticisms or disagreements with Council policy or decisions, including decisions relating to planning and development;
- Complaints which constitute a disagreement with or a refusal to accept legal matters which the Council is obliged to apply;
- A complaint where the customer or the Council has started legal proceedings or has taken court action
- A complaint that has already been heard by a court or tribunal
- Any school exclusion appeal or placing request appeal
- Insurance claims or
- A complaint against the refusal to issue disabled badges or parking exemption and any other complaint such as Housing Benefit decisions, Council Tax and Non-Domestic Rates Appeals where another formal route of appeal exists.

Complainants contacting the Council with regard to issues noted above should be advised why their complaint cannot be dealt with within the Council's framework and, if appropriate, the alternative course of redress open to the complainer.

9. How will we monitor complaints?

9.1 A key component of InForm is recording and monitoring the issues that emerge from complaints and ensuring that services respond to complaints within the agreed timescale. In order to implement effective monitoring of complaints, all services must follow the timescales addressed in the Stages outlined previously.

9.2 So that the Council can monitor complaints received across the Services it needs to gather information from Services, which can then be analysed by Corporate Communications and Public Affairs.

It is proposed that the Customer Liaison Officer in each service supplies Corporate Communications and Public Affairs with details of the following:

- Total number of complaints received at Stage 1 and 2
- % of complaints resolved within timescale
- The number of complaints by category e.g. policy issues, customer care issues etc.
- Details of what the Service is doing in response to issues raised by the complaints.

9.3 As part of our commitment to tackling inequalities we will monitor complaints by sending an optional equality and diversity questionnaire for complainers to fill in, explaining the reasons for doing so. This will help us to identify any issues regarding discrimination that certain groups within our communities have encountered when dealing with the Council. In addition, we will be able to monitor the take up of our complaints procedure and assess the extent to which certain groups face barriers in accessing our services. The information that we gather will enable us to take action to improve service delivery for all our customers.

9.4 Corporate Communications and Public Affairs will analyse the returns from each Service and a report will be produced for the Corporate Management Team and elected members, which will enable performance to be scrutinised and action to be taken where an improvement in performance is required. Reports will be produced to fit in with the cycle of the Policy and Resources Committee.

9.5 A key component of InForm will be introducing a system that will enable services to record details of the comments, compliments and complaints they receive. It is likely that either the Lagan CRM or electronic performance management system will eventually be able to be utilised for recording and monitoring comments, compliments and complaints. In the interim, Services should create a database recording the details given previously.

10. How will we measure customer satisfaction with our complaints procedure?

10.1 One of the key objectives of InForm is that it meets the needs of our customers and that they find it convenient to use and understand.

10.2 On an annual basis, Corporate Communications and Public Affairs will send out a survey form to a sample of residents who used Stage 2 of the Complaints Procedure to gauge their views. In this way, we will establish how the system is working in practice and we will be able to make improvements where required based on the feedback received.

11. How will we disseminate our complaints procedure across the Council?

11.1 In order to ensure that InForm is implemented across the Council we need to ensure that relevant employees receive sufficient training in what the processes are. Heads of Service and Managers would be the first to receive this training. This will be undertaken initially by Corporate Communications and Public Affairs. The long term plan once the Customer Service Strategy is implemented would be for an in-house customer care training course to be developed and aimed at front-line customer facing employees who have regular contact with the general public. The objective of the course will be to train our employees on our corporate standards of customer service, including InForm.

12. How we will inform our customers of changes made to services

12.1 One of the key objectives of introducing a corporate system to deal with comments, compliments and complaints is to enable improvements to be made to services. Producing a quarterly report for the Corporate Management Team and Elected Members that highlights the main issues arising from complaints and recommending improvements that could be made will provide the mechanism for changes to take place.

However, it is also important that we inform the public of changes that have been made to services as a result of complaints. We will do this by highlighting any changes or improvements made to services through the Directorate Performance Plans and, where relevant, the Council website and media coverage.

13. Conclusion

13.1 A comprehensive, up to date and accessible complaints policy is a fundamental element of the Council's whole approach to customer care. InForm is intended to

represent a practical means by which we can demonstrate our determination to manage the Comments, compliments and complaints process effectively for the benefit of our customers and the Council.

InForm Implementation Plan

Action	Lead Officer	Timescale	Outcomes
Consultation with Chief Officers and other relevant officers	Head of Corporate Communications and Public Affairs	February 2009	Ensure full input to planned processes. Full sign up across all services to recognise and use InForm.
Briefing for Elected Members	Head of Corporate Communications and Public Affairs	March 2009	Elected Members will be briefed as to how InForm is to work and their role in the process. This will allow for smoother handling of complaints received by Elected Members, both locally and nationally.
Preparation of posters, leaflets and other branded imagery to promote InForm	Head of Corporate Communications and Public Affairs	1 April 2009	Full suite of leaflets and posters to raise awareness of InForm. Also to be made available electronically via the Council website. All materials will follow a set corporate brand
Implementation of InForm	Head of Corporate Communications and Public Affairs	1 April 2009	Full framework in place across all Council services.