

Agenda Item	11
Report No	AS/13/21

HIGHLAND COUNCIL

Committee: Audit and Scrutiny

Date: 17 June 2021

Report Title: Annual Report on Corporate Complaints Performance

Report By: Executive Chief Officer, Communities and Place

1. Purpose/Executive Summary

- 1.1 This report provides an update for Members on the Council's corporate complaints performance for the period 1st April 2020 to 31st March 2021 along with comparative data for the previous two years.
- 1.2 The successful implementation of the Scottish Public Services Ombudsman's (SPSO) Model Complaint Handling Procedure (MCHP) came into use in April 2021 and provides refreshed guidance to our citizens, customers and staff.
- 1.3 The Council's corporate performance on the number of complaints handled within the 5 working day target set by the SPSO at front-line resolution (Stage 1) has improved to 54.1%; an increase of +4.56% on the comparative period in 2019/20. There is also a reported increase in performance to 68.7% (+14.15%) for complex investigation complaints (Stage 2) where the SPSO target is 20 working days.

2. Recommendations

- 2.1 Members are invited to:
 - i. scrutinise the Council's performance for front line resolution (+4.56%) and complex investigation complaints (+14.5%) complaints;
 - ii. note the early indications of an increase in the Councils ability to manage complaints at the first point of contact through the Customer Resolution & Improvement Team (53% resolved at Frontline in Q4)
 - iii. note the timely implementation of the revised Model Complaint Handling Procedure as per SPSO requirement during the pandemic period;
 - iv. note officers' continued participation in the Local Authority Complaint Handlers Network;
 - v. scrutinise the action plan to drive improved performance through a quality and customer centric focussed approach; and
 - vi. encourage constituents to use the correct channels available to ensure their complaint can be assessed and resolved in a timely manner.
 - vii. Note that a more comprehensive Corporate Complaints Process Annual Report, covering a broader set of indicators, will be taken to this committee in August before submission to the SPSO.

3. Implications

3.1 Resource:

Prior to March 2020 customer services officers were based within individual services, they have now been brought together to form a corporate team with a new team leader, focussing on a consistency approach with first contact customer resolution.

3.2 The Executive Leadership Team have arrangements in place via the central team in the Communities & Place Service, to prioritise complaints and achieve statutory targets.

3.3 **Legal:** The Council's complaint process is fully compliant with the SPSO's statutory front-line resolution and complex investigation complaint processes and Officers participate in the benchmarking undertaken in partnership with the SPSO.

3.4 **Community (Equality, Poverty and Rural):** Analyses and learning from complaints helps inform improvements in the design of our services and policies. Improving performance in contact with our citizens and customers is part of our approach to improving engagement and openness with our communities across Highland in urban and rural areas.

3.5 **Climate Change/Carbon Clever:** 83% of complaints were received and responded to via digital channels which reduces paper usage and printing which helps contribute to reducing our carbon footprint.

3.6 **Risk:** Complaints management is a critical component of the Council's overall approach to citizen and public engagement and to achieving more efficient and effective delivery of services.

3.7 **Gaelic:** There are no new implications arising from this report.

4. Introduction

4.1 All Scottish Local Authorities must operate to a new and revised Model Complaint Handling Procedure (MCHP) as laid out by the Scottish Public Ombudsman This mandatory complaint process is defined by the Scottish Public Services Ombudsman (SPSO). The MCHP were revised in 2019 by the SPSO in consultation with all sectors. As part of this, local authority and social work procedures were combined into a single procedure. This new edition includes a core text, which is consistent across all public services in Scotland, with some additional text and examples specific to local authorities and health and social care partnerships (HSCPs) handling social work complaints.

4.2 The SPSO has asked all local authorities to implement its Model Complaint Handling Procedure by April 2021 which the Council successfully completed within deadline.

The following guidance is now published on our website [here](#)

Part 1 – Overview & Structure - Introduction by the CEX, explanation of each document plus details of the expected behaviour of both staff and customers.

Part 2 – When to use this procedure - Detailed guidance of who can make a complaint, what can be complained about, plus guidance regarding specific scenarios including Health & Social Care specific complaints.

Part 3 – The Complaints Handling Process - Detailed guidance on the process of a complaint, how the complaint will be handled, and the focus on resolving complaints (where appropriate) as much as possible.

Part 4 – Governance - The roles and responsibilities of Council staff, training requirements, and how we record, report, and publicise the lessons we have learnt.

Part 5 – Customer Facing CHP - The customer version of the documentation, providing condensed guidance and Council contact details. The quick guide to our complaints procedure is attached at Appendix 1 for information.

4.3 The Council currently report to the SPSO on 8 performance indicators Appendix 2

The focus for the organisation, and this report, are the 2 key performance indicators that refer to complaints closed within the target timescales, indicator 5.

The other indicators are included in a more comprehensive report, Corporate Complaints Process Annual Report. The report will be presented to this committee in August prior to submission to the SPSO and publication by the end of September.

4.4 The SPSO has not revised these performance indicators at this time but has intimated they are likely to do so. Additional reporting has been requested to cover analysis of complaints trends, together with lessons learnt – see Part 4 (Governance) of the MCHP for further information.

4.5 An action plan for embedding the MCHP covering training, communications, reporting and Service engagement is attached as Appendix 3. This action plan has been approved and fully supported by the Executive Leadership Team and will be owned by Customer Services and delivered by the Customer Resolution & Improvement Team Leader.

5. Customer Resolution & Improvement

5.1 A paper was presented at Communities and Place Committee on 19 August 2020, which outlines the changes necessary to improve the Council's performance in relation to enquiries, complaints, Freedom of Information requests, Subject Access Requests, and MP/MSP contacts. It also detailed the work to replace the Council's ICT system for managing citizen relationships. The paper can be found at this link -

[Approach to developing and improving citizen and citizen contact and relationships](#)

5.2 The Customer Resolution & Improvement Team was established in December 2020 and work has developed at pace to move service-based Customer Services Officers into one new corporate team. Work is now completed to remove former service mailboxes, develop new processes, and change the focus from a service-based approach to a new corporate task-based approach. Customer Services Officers will retain their service knowledge as Service Champions to consolidate their relationships with service-based staff and networks, and they will undertake a planned programme of training.

5.3 The introduction of the new MCHP will form the basis for all complaint handling within the Council and will inform the process led by the team, with a focus on early engagement with the customer, the resolution of complaints at the earliest stage possible, the provision of excellent customer care and engagement with Services on lessons learnt to inform Service improvements.

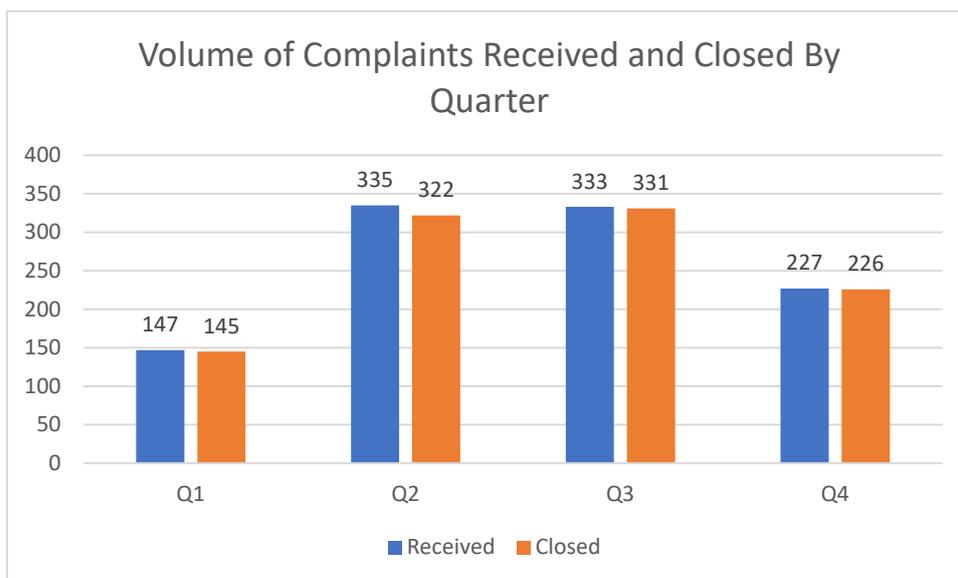
5.4 The complaints process has now migrated to the new CRM solution and has been in operation since 21 January 2021. The system compliments the approach of early assessment to enable the timely resolution at first contact. Liaison will continue with Digital Services to refine the process and continually make improvements for staff and our customers. An action noted in the Communities and Place Service Plan reported to the Committee in May 2021 is to explore this year a Members' Portal as part of the new CRM process with the intention of helping Members manage their caseload and have up to date Ward business information.

5.5 Early indications from this new approach has shown significant progress as the Customer Resolution & Improvement Team have directly resolved 53% of Frontline complaints at first customer contact, within Q4 20/21.

5.6 Examples of this positive customer centric engagement are provided in Appendix 4.

6. Annual Performance & Reporting

6.1 For the 12-month period 1 April 2020 to 31 March 2021, the Council received a total of 1,042 complaints (1,726 2019/20). This decrease in complaints received can be contributed to the pandemic period with two periods of lockdown restrictions. The graph below details the spread of complaints received and closed by quarter with the periods of lockdown occurring in Q1 and Q4.



6.2 Policy and legislative changes, together with seasonal, social, economic and other external factors throughout the year, influence the volume of complaints received. 2020/21 has been heavily influenced by the unprecedented COVID Pandemic.

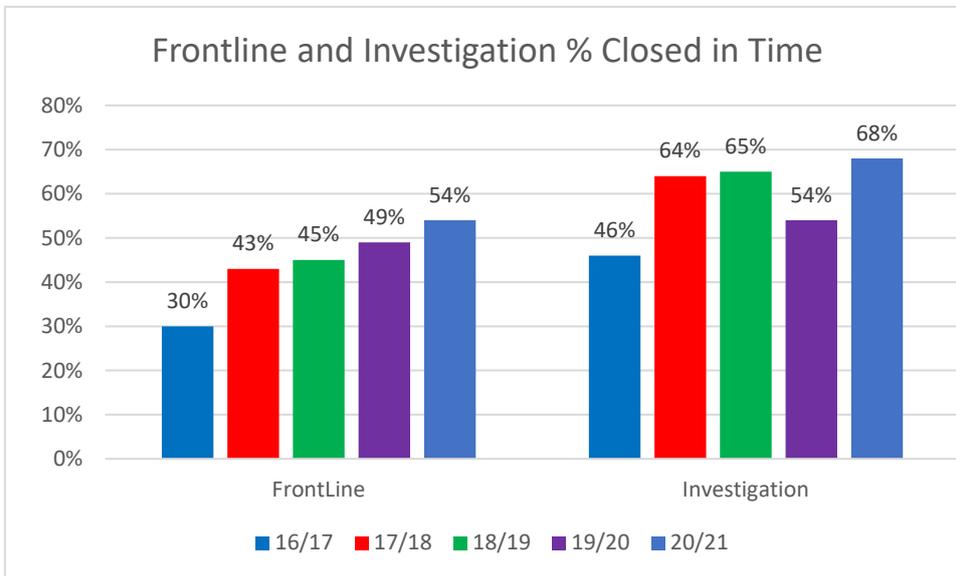
6.3 Citizens' preference for making a complaint continues to be self-serve through the Council's website, with an increase to 69% of complaints logged this way. When combined with email channel, 83% of complaints are received via a digital channel. Citizens who engage with us online are going directly to the Customer Resolution & Improvement Team, further enhancing the first contact resolution.

6.4 A link to the Councils Complaints form can be found [here](#)

6.5 The Council's corporate performance on the number of complaints handled within the 5 working day target set by the SPSO at front line resolution has improved to 54.1%; an

increase of +4.56% on the comparative period in 2019/20. There is also a reported increase in performance to 68.7% (+14.15%) for complex investigation complaints where the SPSO target is 20 working days.

The graph below shows the improvement trend for this KPI



6.5 To be able to make improvements and understand customer complaints in greater detail, the Top 10 topics of complaint are detailed below. This table of information is used to inform engagement between the Customer Resolution & Improvement Team and Services to target the areas of customer complaints which can provide the biggest impact on complaint handling performance and outcomes for the customer.

Reason	Ranking				No. Complaints Received			
	2017/18	2018/19	2019/20	2020/21	2017/18	2018/19	2019/20	2020/21
Council Housing (including allocation of council housing, etc.)	2	1	1	1	366	366	386	289
Rubbish and Recycling (Bulky uplift, bins for your home etc.)	4	5	5	2	228	125	147	147
Roads and Pavements (Pot holes, Street lighting etc.)	1	2	2	3	391	161	235	85
Council Tax (Billing, Payments etc.)	5	4	7	3	182	136	102	85
Land and Property	3	3	3	5	284	144	187	73
Planning and Building Control (Planning permission, Pre-planning Advice, etc.)	6	7	8	6	104	91	72	68
Schools (Catering etc.)	7	6	6	7	101	106	107	40
Regeneration and Town Centre Management	*	*	*	8	*	*	*	32

Parks gardens and Open Spaces	*	*	*	9	*	*	*	18
Parking and Car Parks	9	8	10	10	59	40	32	13

*Not within the 10 most common reasons for 2017/18, 2018/19 or 2019/20

** 1 equals the largest volume of complaints and is based on annual data

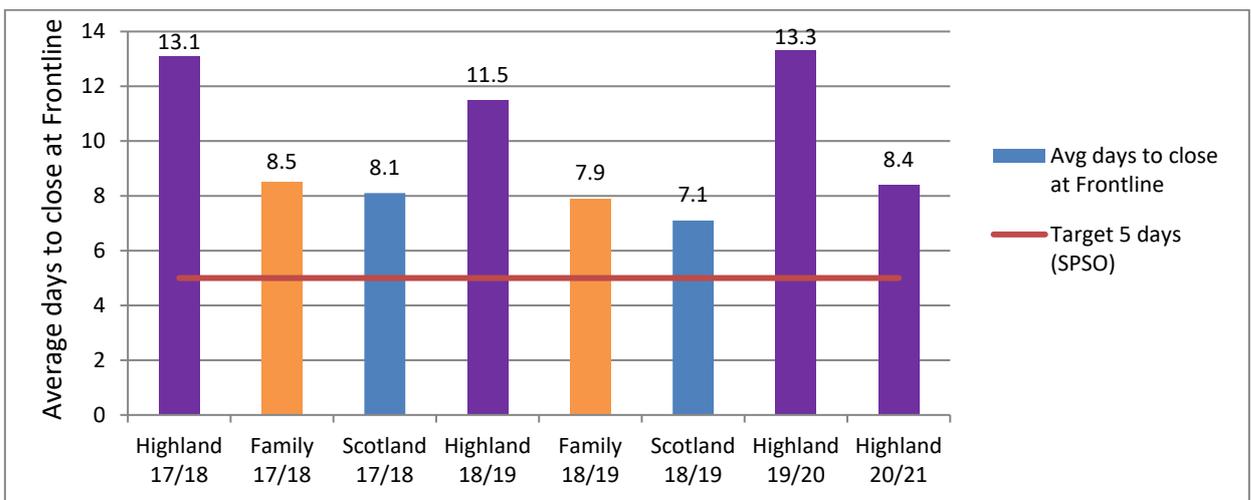
While Council Housing has remained in the top 2 reasons for complaints over the past five years it should be noted that the Council currently has 14,000 tenants with a further 8,000 households on waiting lists.

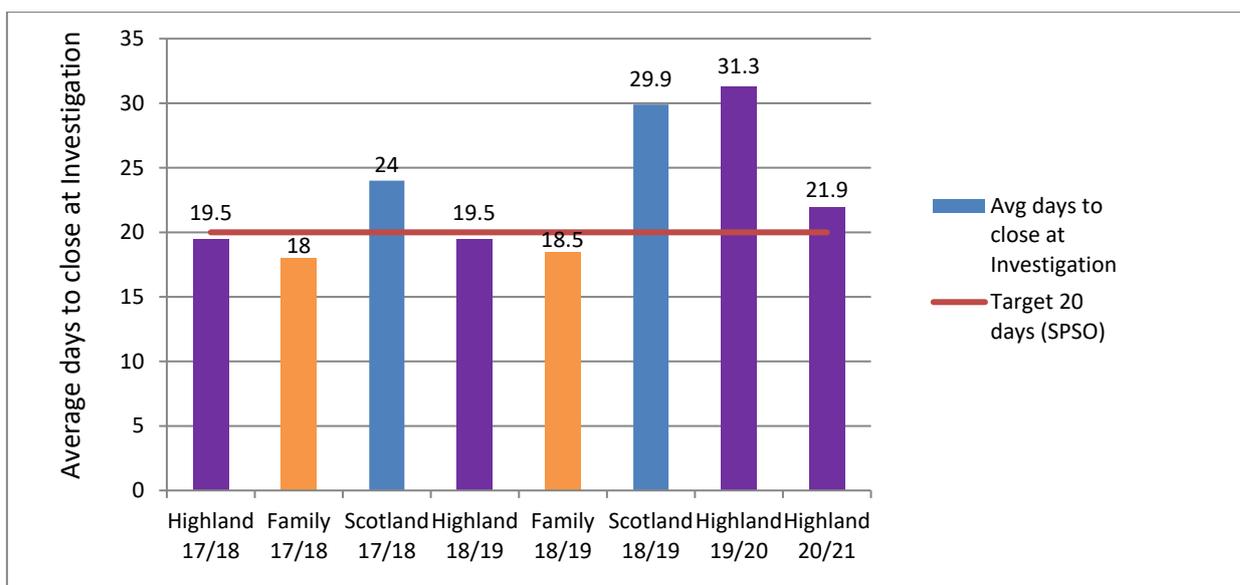
7. Engagement & Continuous Improvement

7.1 The Council continues to participate in quarterly meetings of the Local Authority Complaint Handlers Network (LACHN) which is operated in partnership with the SPSO. A key outcome of this group has been the development of benchmarking family groups. The Highland Council's family group includes: Shetland, Orkney, Western Isles, Scottish Borders, Argyll & Bute, Dumfries & Galloway and Aberdeenshire.

7.2 While benchmarking is a valuable exercise, there are some key differences that can impact on results. For example, not all local authorities have retained their housing stock and some regard a first missed bin as a complaint whereas other local authorities treat such contacts as a request for service. Due to the COVID pandemic benchmarking activity has not taken place in 19/20 but we hope to receive the 20/21 data in July. The graphs at paragraph 7.3 demonstrate Highland performance against our family group and Scottish averages for 17/18 and 18/19 data in regard to the average number of working days taken to close complaints at Frontline (target within 5 days) and complex Investigation (target within 20 days).

7.3





- 7.4 The Customer Resolution & Improvement Team Leader has made it a priority to engage with Service Management Teams and address the most complained about areas of Council service delivery (as detailed in Section 6.5)
- 7.5 Engagement takes many formats from attendance at Senior Management Meetings to discussions with Service system staff; many quick fixes have been achieved this way with encouraging positive feedback from officers.
- 7.6 The Customer Resolution & Improvement Team will continue to engage with Services and provide guidance and assistance to Managers. Services will be asked to attend a facilitated improvement workshop meeting bi-monthly to review and improve complaint handling, sharing best practice and outcomes for the customer.
- 7.7 The Customer Resolution & Improvement Team will keep a corporate record of all engagement with Services, ensuring improvements are with an appropriate Manager and there are timescales set for actions where these have been identified. This will ensure we identify the root cause of complaints and take action to reduce the risk of recurrence.
- 7.8 The SPSO expects Local Authorities to provide all staff with complaints handling training at induction and further refresher training provided to all staff at regular intervals. The Customer Services Delivery Manager/Customer Resolution & Improvement Team Leader will continue to work with Learning & Development and HR on this to develop and deliver appropriate training as per the agreed action plan.

Designation: Customer Services Delivery Manager
Customer Resolution and Improvement Team Leader

Date: 17 June 2021

Author: Jane Ross, Customer Services Delivery Manager
Angela Morrison, Customer Resolution and Improvement Team Leader

Background Papers: Audit and Scrutiny Committee papers September 2020
Communities & Place August 2020

Appendix 1

Complaints Handling Quick Guide

Complaints procedure

You can make your complaint in person, by phone, by email or in writing.

We have a **two-stage complaints procedure**. We will always try to deal with your complaint quickly. But if it is clear that the matter will need investigation, we will tell you and keep you updated on our progress. *If your complaint relates to a care service you can choose to complain to us or to the Care Inspectorate.*

Stage 1: Frontline response



We will always try to respond to your complaint quickly, within **five working days** if we can.

If you are dissatisfied with our response, you can ask us to consider your complaint at stage 2.



Stage 2: Investigation

We will look at your complaint at this stage if you are dissatisfied with our response at stage 1. We also look at some complaints immediately at this stage, if it is clear that they need investigation.

We will acknowledge your complaint within **three working days**.

We will confirm the points of complaint to be investigated and what you want to achieve.

We will investigate the complaint and give you our decision as soon as possible. This will be after no more than **20 working days** *unless* there is clearly a good reason for needing more time.



Scottish Public Services Ombudsman

If, after receiving our final decision on your complaint, you remain dissatisfied with our decision or the way we have handled your complaint, you can ask the SPSO to consider it. There are some complaints that have an alternative route for independent review. We will tell you how to seek independent review when we give you our final response on your complaint.

We will tell you how to do this when we send you our final decision.

Appendix 2

SPSO Key Performance Indicators

1.	The total number of complaints received per thousand of population.
2.	Complaints closed at Frontline and complex Investigation as a percentage of all complaints closed.
3.	The number of complaints upheld or partially upheld/not upheld at each stage as a percentage of complaints closed in full at each stage.
4.	The average time in working days for a full response to complaints at each stage.
5.	The number of complaints which were closed in full within the set timescales of 5 working days and 20 working days.
6.	The number and percentage of complaints at each stage where an extension of 5 or up to 20 day timelines has been authorised.
7.	Citizen Satisfaction Survey.
8.	Outlining improvements to services or procedures as a result of the consideration of complaints.

Appendix 3 Action Plan

Topic	Target Audience & Delivery	Subject	Responsible Service/Officer	Lead Staff	Target Date
Training	All new employees – revised My Online Learning provision and guidance issued to Managers	Refreshed Induction Training on Complaints Handling – to include the Complaints Handling Procedure (CHP) <ul style="list-style-type: none"> • how to handle and record complaints at the frontline response stage • who they can refer a complaint to, in case they are not able to handle the matter • the need to try and resolve complaints early and as close to the point of service delivery as possible; and • their clear authority to attempt to resolve any complaints they may be called upon to deal with. • The journey of a complaint including the role of the SPSO 	ECO Communities & Place Services/Head of Performance & Resources Head of Human Resources	Customer Services Delivery Manger/Customer Resolution & Improvement Team Leader Input from Human Resources/Learning & Development	By end September 2021
	All employees – revised My Online Learning provision and guidance issued to Managers	Complaints Refresher Training – to include the information above Note: this will also link in with FOI Training and the improved training for staff as per the Scottish Information Commissioners Improvement Plan.	ECO Communities & Place Services/Head of Performance & Resources Head of Human Resources	Customer Services Delivery Manger/Customer Resolution & Improvement Team Leader Input from Human Resources/Learning & Development	By end March 2022
	Staff who receive a high volume of complaints – individual/ Group Teams training	Targeted Individual Staff/Team Training delivered by Customer Resolution & Improvement Team Leader Specific training on the journey of a complaint and how to avoid escalated complaints.	ECO Communities & Place Services/Head of Performance & Resources	Customer Services Delivery Manger/Customer Resolution & Improvement Team Leader	Ongoing – throughout 2021/22

	Frontline Customer Services Staff	Targeted training at the frontline to address and de-escalate customer complaints. Enhanced complaint training to understand how to manage a complaining customer and the role they must play in managing expectations	ECO Communities & Place Services/Head of Performance & Resources	Customer Services Delivery Manger/Customer Resolution & Improvement Team Leader	By End May 2021
Communication Plan	Senior Management – email circular	Senior Management updated information on complaints handling - signpost to documentation and guidance	ECO Communities & Place Services/Head of Performance & Resources	Customer Services Delivery Manger/Customer Resolution & Improvement Team Leader	April 2021
	All Staff – Corporate Comms email	All User email - signpost to documentation and guidance	ECO Communities & Place Services/Head of Performance & Resources	Customer Services Delivery Manger/Customer Resolution & Improvement Team Leader	April 2021
	All Staff – Staff Connections article	Staff Newsletter article to introduce the revised complaints process and the Customer Resolution & Improvement Team	ECO Communities & Place Services/Head of Performance & Resources	Customer Services Delivery Manger/Customer Resolution & Improvement Team Leader	April 2021
	Members	Progress report to be delivered to next Communities & Place committee to include linking in with Digital Services on the Members Portal to grow the solution of support and management available to them.	ECO Communities & Place Services/Head of Performance & Resources	Customer Services Delivery Manger/Customer Resolution & Improvement Team Leader	May 2021*
	Customers/Citizens	Update www.highland.gov.uk with updated documentation	ECO Communities & Place Services/Head of Performance & Resources	Customer Services Delivery Manger/Customer Resolution & Improvement Team Leader	April 2021

	All Staff	Update https://www.highland.gov.uk/staffsite/ with information for staff	ECO Communities & Place Services/Head of Performance & Resources	Customer Services Delivery Manger/Customer Resolution & Improvement Team Leader	April 2021
Reporting	ELT and Service Management Teams	In addition to existing Weekly Performance Report, and existing QPR performance indicators – additional lessons learnt to be reported with trends and analysis	ECO Communities & Place Services/Head of Performance & Resources	Customer Services Delivery Manger/Customer Resolution & Improvement Team Leader	End Quarter 1 21/22
	Customers/Citizens	Adapted version of above reporting, to provide information on a 'You said, we did' approach	ECO Communities & Place Services/Head of Performance & Resources	Customer Services Delivery Manger/Customer Resolution & Improvement Team Leader	End Quarter 1 21/22
Service Engagement	Senior Management Teams/Middle Managers – as appropriate	Customer Resolution & Improvement Team attendance at Senior Management Team meetings in each service quarterly to feedback and update managers	ECO Communities & Place Services/Head of Performance & Resources	Customer Services Delivery Manger/Customer Resolution & Improvement Team Leader	Ongoing
	Corporate Group	Creation of Corporate Complaints Group to meet bi-monthly. To review best practice, inform improvements and analyse performance figures. Membership to comprise of Customer Resolution & Improvement Team, representatives from each Service – where appropriate other sections of the Council may be invited to contribute – L&D/Equalities etc.	ECO Communities & Place Services/Head of Performance & Resources	Customer Services Delivery Manger/Customer Resolution & Improvement Team Leader	End Quarter 2 21/22

Appendix 4

Case Studies – Frontline Resolution

A customer submitted a complaint regarding lack of communication and follow-through from a member of staff. The Customer Resolution & Improvement Team provided the member of staff with an on the spot apology, with an undertaking to contact the member of staff and progress the issue. The staff member was on leave, and the matter was escalated to their manager. The customer was contacted by the Service that day and the Customer Resolution & Improvement Team closed the complaint as 'resolved' to the customer and Council's satisfaction

Investigation

A customer had used the Council's online form to report an issue which was routed electronically to the correct team. The same issue had occurred on several occasions and the customer submitted a complaint in early December 2020 about the Council's lack of action and consistency in relation to his concern.

The Complaint was responded to; however, the customer remained unhappy with the response and requested the complaint be escalated to the Investigation stage. After the Investigation response was sent to the customer, they wrote back to advise they remained dissatisfied with the response.

The Customer Resolution & Improvement Team Leader reviewed the complaint and all interactions with the customer, and identified lessons learnt in the interactions between the customer and the departments of the Council they had spoken to.

The customer was phoned to discuss the case directly and the failings which had been identified and an apology was made for both the Service issues and the way in which the complaint was handled. The customer was grateful for the intervention shown by the Council, and they felt they were listened to; they were informed their experience would be used to inform future lessons learnt and the customer was pleased with this outcome. The complaint was now resolved to the customer's and the Council's satisfaction.

Before the phone call, the customer has been determined to go to the SPSO to continue the complaint against the Council.