

**To: Audit, Risk and Scrutiny Board**

**On: 14 November 2022**

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**Report by: Chief Executive**

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**Heading: 2021/22 Complaints Handling Performance**

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## **1. Summary**

- 1.1 Renfrewshire Council's complaint handling procedure (CHP) helps the Council to improve services and processes based on customer feedback. It is one of a range of methods to help the Council understand how well it is delivering its services.
- 1.2 Introduced in 2013, the Council's CHP complies with the Scottish Public Services Ombudsman's (SPSO) guidance and aims to help 'get it right first time'. The expectation is to have quicker, simpler and more streamlined complaints handling with early response by capable, well-trained staff. As part of the procedure, all complaints are recorded and monitored.
- 1.3 This report provides information on complaints closed during the year from 1 April 2021 to 31 March 2022 and performance on key indicators, as well as highlighting improvements made to the complaints handling procedure (CHP) to ensure that complaints are handled well, and the organisation learns from them and improves service delivery where appropriate.
- 1.4 The key messages highlighted in the report are as follows:
  - 9,193 complaints were received in 2021/22, compared with 6,179 in 2020/21 (the pandemic resulted in a much reduced volume of complaints in that year) and 7,924 in 2019/20

- 86.8% of our complaints are dealt with as frontline response, demonstrating the Council's commitment to getting it right first time in response to complaints (84.1% in 2020/21);
- 80.6% of frontline complaints and 76.7% of investigation complaints received were completed within target timescales (73% and 74.8% respectively in 2020/21);
- the average time to respond to frontline complaints met the target of 5 days and is an improvement from the previous year figure of 10 days, albeit that year was negatively impacted by the pandemic;
- the average time to respond to an investigation complaint rose slightly from 15 days in 2020/21 to 16.5 days in 2021/22, though this is still well within the SPSO target of 20 days;
- the 2021/22 breakdown of complaints received by services continues to be broadly reflective of the volume of services provided, with Environment and Infrastructure delivering the highest volume and widest scope of frontline Council services and consequently receiving the highest volume of customer interactions;
- the Scottish Public Services Ombudsman (SPSO) introduced changes to the national complaints handling process, which was implemented prior to April 2021 and described in more detail in Section 4 below;
- a new system to support the logging of and learning from complaints was launched by the Council in April 2020, which has meant performance data comes from a single source, this will improve business intelligence and customer insight data.

1.5 A performance scorecard has been included within the appendix of this report to provide additional data. This shows the impact of the pandemic on performance during 2020/21 as well as the improvements in 2021/22 as services continue to recover from the pandemic.

1.6 All indicators will continue to be monitored regularly and support and guidance will be provided to all services to assist with analysing and improving performance where required.

## **2. Recommendations**

2.1 It is recommended that members of the Audit, Risk and Scrutiny Board:

- Note the content of this report.

## **3. Background**

3.1 Renfrewshire Council's Complaint Handling Procedure (CHP) was implemented in 2013 and complies with the model complaints handling procedure for local authorities introduced by the Scottish Public Services

Ombudsman at that time. It is regularly reviewed to include updated guidance.

- 3.2 The CHP reflects Renfrewshire Council's ongoing commitment to the provision of high-quality complaints handling. The CHP operates to ensure that complaints are processed and responded to consistently within target timescales, with a particular focus on working to resolve customer dissatisfaction as close as possible to the point of contact or service delivery.
- 3.3 Services are required to record, analyse and monitor complaints performance and use the information gathered through the CHP to improve service delivery wherever possible.
- 3.4 In line with the SPSO complaints handling procedure, Renfrewshire Council's CHP uses a two-stage process, Frontline Response and Investigation (also referred to as Stage 1 and Stage 2).
- 3.5 The frontline response stage aims to quickly resolve straightforward customer complaints that require little or no investigation. Any member of staff may deal with complaints at this stage, and these are often dealt with 'on the spot' – an explanation, apology or an action to put something right may all be appropriate responses to a frontline complaint.
- 3.6 The main principle is to seek an early response, resolving complaints at the earliest opportunity and as close to the point of service delivery as possible. This may mean a face-to-face discussion with the customer or asking an appropriate member of staff to deal directly with the complaint. The Council has 5 days to respond to these complaints.
- 3.7 An example of a complaint which may be addressed at the frontline response stage is where a customer complains that a staff member failed to attend a scheduled appointment. When this is reported, the service should provide an apology and reschedule the appointment at a suitable time for the customer.
- 3.8 Not all complaints are suitable for frontline response and not all complaints will be satisfactorily resolved at this stage. Investigation complaints are typically complex or require a detailed examination before resolving. These complaints may already have been considered at the frontline response stage, or they may have been identified from the start as needing investigation. In these cases, the customer should receive an acknowledgement of their complaint within three working days and be advised that it is being dealt with as an investigation.
- 3.9 An investigation aims to establish all the facts relevant to the points made in the complaint and to give the customer a full, objective and proportionate

response that represents the final position. The Council has 20 days to respond to these complaints.

- 3.10 An example of an investigation complaint may relate to the standard or nature of a repair within a Council property which requires an inspection or visit to investigate. As a supervisor or manager might need to examine the repair to assess this and agree with the customer the corrective work required, it may require the 20-day timescale. Services may also agree an extension to the timescale with the customer.
- 3.11 In line with the model complaints handling procedure provided by the SPSO and with practice in other local authorities, Renfrewshire's complaints policy does not include a number of service areas that are processed through other means, some examples include: the right to appeal a refusal of planning permission or to appeal planning conditions (this is made to the Local Review Body or the Scottish Ministers); allegations of bullying in schools (these are treated and investigated as bullying incidents by the education establishment); and a compensation claim for personal injury, loss of or damage to property (these are processed through the Council's standard 'Public Liability Claim Form').
- 3.12 Since April 2017, social work complaints have been handled as part of the standard SPSO local authority procedure rather than as a separate process. Complaints relating to social work and social care for justice social work and for children and families are reported as part of the Children's Services total. The figures for Renfrewshire Health and Social Care Partnership relate to social work and social care services for adults; the HSCP data does not include complaints about NHS services.

#### **4. National guidance from the Scottish Public Services Ombudsman (SPSO)**

- 4.1 The SPSO completed a review on their own guidance and model complaints handling procedure in 2019. Local authorities had until 1 April 2021 to implement these national changes, the key changes to the statutory model are set out below:
- a new outcome to a complaint was introduced, where a complaint can be classed as resolved. A complaint is resolved when both the Council and the customer agree what action (if any) will be taken to provide full and final resolution for the customer, without making a decision whether the complaint is upheld or not upheld;
  - where a customer has received a frontline response to their complaint and wishes to escalate their complaint to investigation, they must request this either within 6 months of when they first knew of the problem, or within two

months of receiving their response to their frontline complaint (if this is later); and

- the points of an investigation complaint and expected outcomes are clear from the complaint, these must be set out in the initial acknowledgment asking the customer to get in touch if they disagree.

4.2 When the Council's new complaints system was being developed it was configured to make sure it could capture any new information required ahead of the April 2021 deadline, such as adding the new resolved outcome and the change of terminology required. The Council's complaints policy has been updated to reflect these changes with additional guidance provided to staff.

## **5. Impact of COVID recovery on complaints handling**

5.1 Nationally, the COVID-19 pandemic had an impact on complaints handling, particularly during 2020/21 when staff who were involved in complaints handling were redeployed to critical response work. In that same year there was a considerable drop – more than 20% - in the volume of complaints received. This was particularly evident in the first national lockdown.

5.2 As services have worked to support recovery from COVID and moved back towards business as usual, the Council has seen an increase in the number and also the complexity of complaints received. The enforced pausing of Council services during lockdown periods, and the restrictions to service delivery meant there was a significant number of pending jobs in some areas once services were permitted to restart, and this coupled with new service requests led to increased wait times for some services.

5.3 There were large increases in the volume of complaints received in the first half of the year. Excluding the period of the pandemic year, there was an increase in complaints received in Q1 and Q2 compared with 2019/20 (5544 and 3203) though some of this will be attributable to improved recording and reporting.

5.4 Only 8%, or 725, complaint cases were made directly through a customer's MyAccount with the majority being received through the Customer Service Centre, or via the Council complaints mailbox link from our website.

5.5 SPSO targets have remained unchanged. Despite an increase in the number of complex complaints requiring investigation (from 819 to 1212) performance improved, with 76.7% completed within the target time compared with 74.8% in 2020/21.

5.6 The SPSO has reminded public bodies that the Model Complaints Handling Process (MCHP) provides some flexibility in terms of timescales if the process is followed, and complainers are kept informed. This advice included escalating a frontline response complaint or applying an extension of

timescales for investigation complaints. For 2021/22, the number of cases applying an agreed extension as a percentage of all complaints closed at investigation was 4.89% or 60 complaints, a decrease from 2020/21 which was reported as 8.96% or 81 complaints.

- 5.7 When reviewing 2021/22 performance, the factors noted above are actively being considered to identify any trends, comparisons and training support required.

## **6. 2021/22 Council Performance**

- 6.1 Complaints are crucial in identifying areas or processes that need to be improved for our customers and Councils are required to report their complaints handling performance against a range of key performance indicators related to the SPSO complaints handling procedure. This report provides information on the complaints closed during the period 1 April 2021 to 31 March 2022 and Appendix 1 details Renfrewshire Council's complaints performance for 2021/22 against these key SPSO performance indicators. The SPSO publishes all local authority complaints annual reports on its website.
- 6.2 A new complaints system was launched in April 2020 and has now been fully rolled out with all Council services logging their complaints on the same system. This means that for reporting purposes, all performance data is now taken from a single source for the first time and therefore comparisons between years should be treated with caution as previous years won't reflect complaints data from all services.
- 6.3 In 2021/22, the number of complaints received increased from 6,179 in 2020/21 to 9,193 in this reporting year. It has been noted already that complaints were lower than usual in 2020/21; the 2021/22 figure also represents a 15% increase on the number of complaints received in 2019/20. More than 80% of that increase relates to complaints received by Environment and Infrastructure; a combination of improved recording and reporting and the ongoing impact of the pandemic has contributed to the increase.
- 6.4 All Council services strive to ensure that complaints are answered correctly first time and that customers are responded to quickly, and during 2021/22 86.8% of complaints were addressed through a frontline response. Despite significant pressures as services recovered from the pandemic restrictions and the increased volume, 80.6% of frontline complaints and 76.7% of investigation complaints received were completed within target timescales. This compares with 73% and 74.8% respectively in 2020/21.

- 6.5 The average time to respond to an investigation complaint was 16.5 days, which is within the SPSO target of 20 days. The average time to respond to a frontline response complaint was 5 days, which is on target. As highlighted in previous reports, prior to April 2020, both Environment and Infrastructure and Children's Services used a different complaints system and therefore the Council's average time to complete frontline and investigation complaints performance indicators did not previously include these service areas.
- 6.6 For the indicators that have declined in performance, the reasons will continue to be explored to understand the trends and the impact of COVID-19 over time, as this report reflects on financial year 2021/22 where there was still national guidance in place impacting the Council's service delivery. Work will be undertaken with services to identify where additional support and guidance is required. Work is also ongoing in partnership between the Council and our system supplier to continue to develop the new complaints system to ensure it meets the needs of all services and allows us to accurately reflect performance. Performance will continue to be closely monitored across all services throughout the year.
- 6.7 As part of the functionality of the new complaints system, customers can also provide comments and compliments, with 275 cases recorded during 2021/22 (256 comments and 19 compliments). A few examples of these compliments are provided below:
- "Customer said that all staff that he spoke to today were extremely patient, helpful and very nice and he would like to thank all for that."
  - "Earlier in the year I reported regular noise from a loose metal cover which clattered every time a car went over it. It has now been repaired and cannot be heard at all. This is just to say thank you very much for doing this."
  - "I had occasion recently to contact the council by telephone to discuss Council Tax. On each occasion the person to whom I spoke was so helpful and I just wished to say well done and thank you."
  - "Thank you to the Paisley team. On Thursday a crew member went above and beyond to help my mother get her bin back up the lane and into her property on Thursday. Excellent attitude and approach which should be commended."
- 6.8 Figures 1 and 2 below show the service breakdown of total complaints received and those closed within the timescales, during the period 1 April 2021 to 31 March 2022. This is for frontline response, and investigation complaints. Figure 3 shows the breakdown by service of investigations which were granted an extension. All such complaints were completed within the target time. The complaints for social work services are included in services provided by Children's Services, whilst the data for the Chief Executive's Service also includes those complaints directly to the Chief Executive.

Figure 1: Frontline Complaints Closed 2021/22

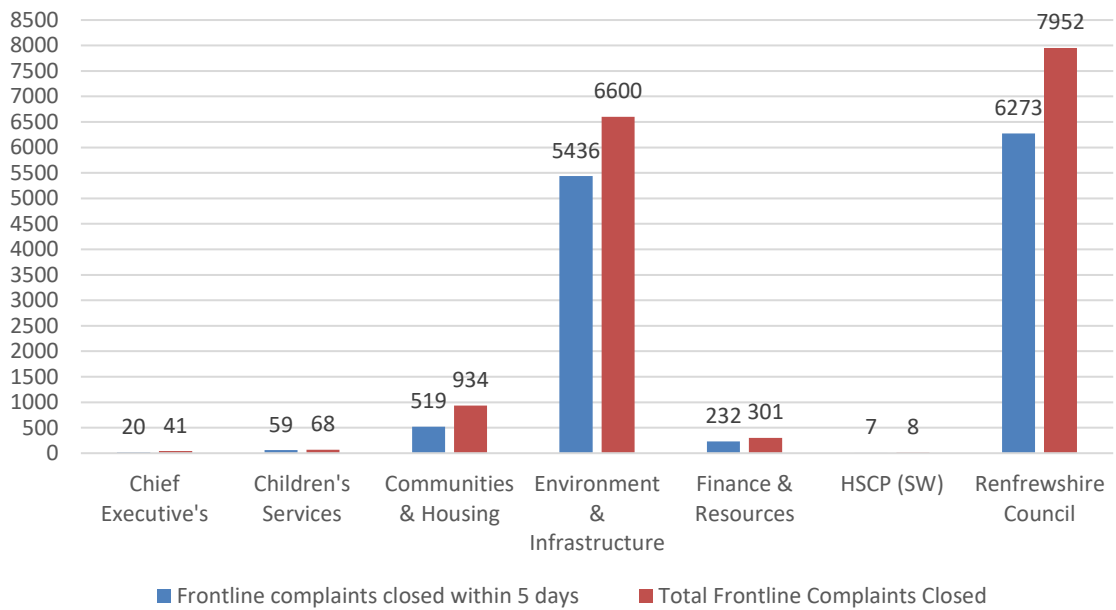


Figure 2: Investigation Complaints Closed 2021/22

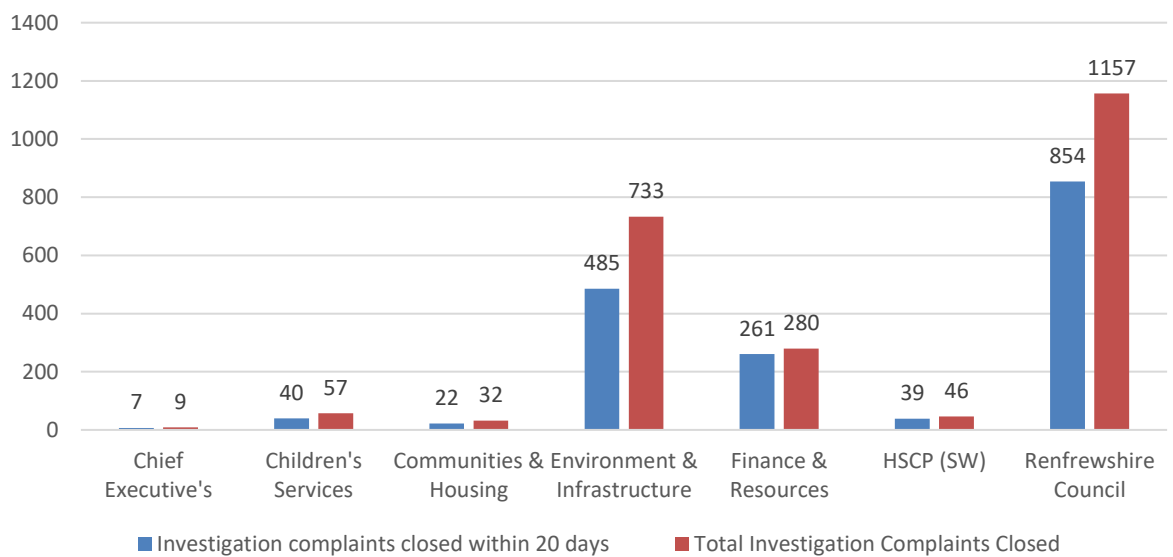
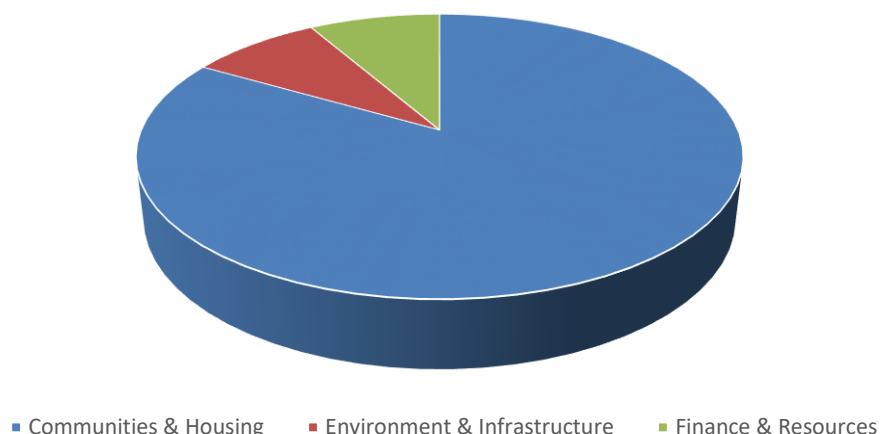




Figure 3: Investigation Extensions, by Service 2021/22



- 6.9 Overall the breakdown of complaints received by services is broadly reflective of the volume of services provided. Environment and Infrastructure delivers the highest volume of frontline Council services, and the most diverse, covering over 270 Council premises, 91,000 households and businesses, and supports more than 849 km of roads and transport infrastructure. It is to be expected therefore that the service will receive the highest level of customer interactions. There was also an increase in investigation complaints received by this service in 2021/22, due to a strengthening of the complaints process within the service. In 2022/23, services will be supported to raise awareness of the extension process for those complaints deemed complex, as low numbers of overall complaints make use of that process.
- 6.10 Environment and Infrastructure has made complaints performance a high priority and has invested in both training and resources for its staff. Extensive training sessions on the new complaints system were carried out online with staff during the COVID pandemic and a greater emphasis on responding to complaints, in a timeous fashion, was communicated to all responsible staff. This training has been continued into the current financial year to ensure new staff are aware of the processes in place.
- 6.11 Scrutiny of complaints data and performance continues to be carried out on a regular basis at management team meetings and has been supported by improvements in both data analytics and access to management information. This investment and focus is now having a positive impact with response rates for frontline resolutions improving from 75% in 2020/21 to 81% in 2021/22. In the first 6 months of this financial year frontline resolutions have increased to 83%. Similar improvements have also been seen in terms of investigation response rates.

- 6.12 In Communities and Housing, the impact of COVID restrictions is still reflected in complaints performance. Although the service was able to restart carrying out repairs following the lifting of these restrictions at various points throughout 2021/22, the accumulated workload had to be managed alongside new repair requests. The impact of this and other service issues, such as issues with availability of materials led to a greater volume of complaints and a higher percentage of complaints answered outwith the timescale of 5 days.
- 6.13 Resource pressures and challenges remaining from periods of restriction are also still evident in the small number of complaints received by the Chief Executive's Service, which mainly relate to delays with planning applications and building warrants.
- 6.14 The majority of complaints made to Finance and Resources related either to Council Tax or to licensing fees and tend to peak in the first quarter of the year, after annual bills have been issued.
- 6.15 Complaints performance in Children's Services is affected by school holiday periods; current SPSO guidance requires these days to be counted in the response time but issues requiring input from school staff cannot be dealt whilst staff are on leave, and so a 'late' response is sometimes unavoidable. The service makes every effort to respond to complaints in a timeous manner, taking cognisance of any sensitivities or complexities related to the child/young person, or associated provision. Current complaints data relates to social work services for children and families, to justice social work, and to those complaints made directly to senior managers about early years and education; it does not yet include frontline complaints dealt with directly by schools and early years establishments.
- 6.16 Children's Services engages with complainants to ensure our responses are comprehensive, informative, and where possible provide a satisfactory resolution. Where possible, the learning from complaints is used to strengthen and improve the approach and the experiences of those who use services.
- 6.17 Renfrewshire Health and Social Care Partnership report complaints related to adult social work and social care to the Integration Joint Board's Audit Risk and Scrutiny Committee. Data on those has also been included in the charts for this report.

## **7. Learning from complaints and improving the Council's complaints procedure**

- 7.1 The new complaint system, “Contact Us” went live on 1st April 2020. It is part of the MyAccount platform, allowing current MyAccount users to log, track and receive a response to their complaint or compliment on this single system. Customers can also still log a complaint online using an online form or by writing, phoning or emailing the Council. As mentioned above, the system was configured to address some of the new national complaints procedure, such as the renaming of frontline complaints and adding the new outcome of resolved complaints.
- 7.2 As the roll out of the new system was carried out during the pandemic, it was supported by online training materials, webinars and a system helpdesk for relevant officers using the new system. Work will continue with schools to progress a roll-out there.
- 7.3 In preparation for the implementation of the SPSO’s revised complaints procedure, additional training materials were developed, highlighting the key changes to the procedure, as well as updated staff guides.
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## **Implications of the Report**

1. **Financial** – none
2. **HR & Organisational Development** - none
3. **Community/Council Planning** –  
We consider our services performance against a number of strategic outcomes to measure how we are delivering better outcomes for our local communities:  
  
Living our Values – complaints are monitored under this outcome of the Council Plan and service improvement planning process.
4. **Legal** - none.
5. **Property/Assets** - none
6. **Information Technology** - none.
7. **Equality & Human Rights** - The Recommendations contained within this report have been assessed in relation to their impact on equalities and human rights. No negative impacts on equality groups or potential for infringement of individuals’ human rights have been identified arising from the recommendations contained in the report because it is for noting only.
8. **Health & Safety** – none
9. **Procurement** – none

10. **Risk** – none
11. **Privacy Impact** – none
12. **COSLA Policy Position** – none
13. **Climate Risk**- none

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**List of Background Papers:** none

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## Appendix 1: Renfrewshire Council Annual Complaints Report SPSO Indicators



Total number of complaints received, frontline and investigation	2019/20	2020/21	2021/22
Total number of complaints received ( <b>open and closed</b> )	7,924	6,179	9,193
Number of complaints <b>closed</b> at Frontline Response (includes those received in 2020/21 and closed in 2021/22)	6,879	5,197	8,082
Complaints <b>closed</b> at Frontline Response as a percentage of all complaints closed	86.8%	84.1%	87.9%
Number of complaints <b>closed</b> at Investigation	1,045	819	1,212
Complaints <b>closed</b> at Investigation as a percentage of all complaints	13.2%	13.2%	13.2%
Number of complaints <b>closed</b> at Investigation after escalation	3	81	60
Complaints <b>closed</b> at Investigation after escalation as a percentage of all complaints	0.03%	1.31%	0.6%

Average time in working days for a full response to complaints at each stage	2019/20	2020/21	2021/22
Average time in working days to respond to complaints at Frontline Response	3.3 *	10	5.0
Average time in working days to respond to complaints at Investigation	13.3*	15	16.5
Average time in working days to respond to complaints after escalation	11 *	10	9.2

***\*Data excludes Environment & infrastructure and Children's Services, who used a different complaint system before 2020/21.***

Percentage of complaints at each stage which were responded to in full within the set timescales	2019/20	2020/21	2021/22
Complaints closed at Frontline Response within 5 working days as a percentage of the total number of Frontline Response complaints	72%	73%	80.6%
Complaints closed at Investigation within 20 working days as a percentage of total number of Investigation complaints	87%	74.8%	76.7%

Number and percentage of complaints where an extension to the timescale has been authorised	2019/20	2020/21	2021/22
Complaints closed at Frontline Response where extension was authorised, as a percentage of all complaints at Frontline Response	0.0%*	0.0%	0.0%
Complaints closed at Investigation where extension was authorised, as a percentage of all complaints closed at Investigation	0.03% *	8.96%	4.89%

***\*Data excludes Environment & infrastructure and Children's Services, who used a different complaint system before 2020/21.***