

## Notice of Meeting and Agenda Audit, Risk and Scrutiny Board

Date	Time	Venue
Monday, 25 October 2021	10:00	Council Chambers (Renfrewshire), Council Headquarters, Renfrewshire House, Cotton Street, Paisley, PA1 1AN

KENNETH GRAHAM  
Head of Corporate Governance

### Membership

Councillor Tom Begg: Councillor Stephen Burns: Councillor Michelle Campbell:  
Councillor Jim Harte: Councillor John Hood: Councillor Emma Rodden: Councillor  
Jane Strang:

Councillor Bill Binks (Convener): Councillor Jim Sharkey (Depute Convener):

### Hybrid Meeting

Please note that this meeting is scheduled to be held in the Council Chambers. However, it is a hybrid meeting and arrangements have been made for members to join the meeting remotely should they wish.

### Recording of Meeting

This meeting will be recorded for subsequent broadcast via the Council's internet site. If you have any queries regarding this please contact Committee Services on 07734358719

To find the recording please follow the link below

[https://renfrewshire.public-i.tv/core/portal/webcast\\_interactive/608639](https://renfrewshire.public-i.tv/core/portal/webcast_interactive/608639).

## **Apologies**

Apologies from members.

## **Declarations of Interest**

Members are asked to declare an interest in any item(s) on the agenda and to provide a brief explanation of the nature of the interest.

## **AUDIT**

### **1      Summary of Internal Audit Reports for period 01 July to 30 September 2021      1 - 8**

Report by Chief Auditor.

### **2      Internal Audit and Counter Fraud Progress and Performance for Period 1 July to 20 September 2021      9 - 16**

Report by Chief Auditor.

## **MONITORING & REVIEWING SERVICE DELIVERY PERFORMANCE POLICIES AND PRACTICE**

### **3      2020/21 Complaints Handling Performance      17 - 28**

Report by Chief Executive.

## **ANNUAL PROGRAMME**

### **4      Review of Bus Deregulation and Effect on Transport Services in Renfrewshire - Lead Officer Jamie Mackie      29 - 34**

Report by Lead Officer.

## **AUDIT**

### **EXCLUSION OF PRESS AND PUBLIC**

The Board may by resolution exclude the press and public from the meeting during consideration of the following items of business as it is likely, in view of the nature of the business to be transacted, that if members of the press and public are present, there could be disclosure to them of exempt information as defined in paragraph 1 of Part I of Schedule 7A of the Local Government (Scotland) Act, 1973.

#### **Exempt Item**

Exempt documents are no longer available in print format. You will require to log in to Audit, Risk & Scrutiny Exempt Items to access documents. Please note that access to exempt documents is now restricted.

#### **5 Summary of Internal Audit Investigation Reports for period 01 July to 30 September 2021**

Report by Chief Auditor.





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

**On: 25 October 2021**

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**Report by: Chief Auditor**

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**Heading: Summary of Internal Audit Reports for period 01 July to 30 September 2021**

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**1. Summary**

- 1.1 In line with the Public Sector Internal Audit Standards, Internal Audit must communicate the results of each engagement to the Board. To comply with this requirement Internal Audit submits regular reports on the findings and conclusions of audit engagements to the Audit, Risk and Scrutiny Board.
- 1.2 Appendix 1 provides details those audit engagements completed during the period 01 July to 30 September 2021 with the overall assurance rating and the number of recommendations in each risk category. The committee summary for each report is also attached. For each audit assignment where recommendations have been made, the relevant managers have put action plans in place to address the issues raised.
- 1.3 In addition to the reports listed in the Appendix, Internal Audit has an ongoing commitment to:
- A range of corporate and service initiatives;
  - Progressing of information security matters in partnership with ICT and Legal Services;
  - The regular provision of advice to departmental officers;
  - The provision of internal audit services to the associated bodies for which Renfrewshire Council is the lead authority and to Renfrewshire Leisure Ltd and Renfrewshire Health and Social Care Integrated Joint Board;

- Co-ordination of the Council's corporate risk management activity;
  - Management of the counter fraud team;
  - Management of the risk management and insurance team.
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## 2. **Recommendations**

- 2.1 Members are invited to consider and note the Summary of Internal Audit Reports finalised during the period from 01 July to 30 September 2021.
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### **Implications of the Report**

1. **Financial** - None
2. **HR & Organisational Development** - None
3. **Community Planning – Safer and Stronger** - effective internal audit is an important element of good corporate governance.
4. **Legal** - None
5. **Property/Assets** - None
6. **Information Technology** - None
7. **Equality & Human Rights** – None
8. **Health & Safety** – None
9. **Procurement** - None
10. **Risk** - The summary reported relates to the delivery of the risk-based internal audit plan.
11. **Privacy Impact** – None
12. **COSLA Implications** – None
13. **Climate Risk** - None

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**Author:** Karen Campbell – 07768354651

## Appendix 1

### Renfrewshire Council

### Internal Audit Service

### Update for Audit, Risk and Scrutiny Board

### Final Audit Reports issued from 01 July – 30 September 2021

Category	Service	Engagement	Assurance Rating	Recommendation Ratings			
				Critical	Important	Good Practice	Service Improvement
<b>Assurance</b>	Finance & Resources	Non Domestic Rates	Reasonable	0	3	2	0
<b>Governance</b>	Finance & Resources	Management of ICT Systems	Reasonable	0	1	0	0

Note 1 – No assurance rating can be given in respect of investigation assignments

Assurance Level	
Substantial Assurance	<ul style="list-style-type: none"> <li>There is a sound system of internal control designed to achieve the objectives of the area being reviewed.</li> <li>The control processes tested are being consistently applied.</li> </ul>
Reasonable Assurance	<ul style="list-style-type: none"> <li>The internal control processes are generally satisfactory with some areas of weakness being identified that could put some objectives of the area being reviewed at risk</li> <li>There is evidence that the level of non-compliance with some of the control processes may put some of the objectives of the area being reviewed at risk.</li> </ul>
Limited Assurance	<ul style="list-style-type: none"> <li>Weaknesses in the system of internal controls are such as to put the objectives of the area being reviewed at risk.</li> <li>The level of non-compliance puts the objectives of the area being reviewed at risk.</li> </ul>
No Assurance	<ul style="list-style-type: none"> <li>Control processes are generally weak with significant risk to the achievement of the objectives of the area being reviewed.</li> <li>Significant non-compliance with control processes leaves the processes/systems open to error or abuse.</li> </ul>

<b>Recommendation Rating</b>	
Service Improvement	Implementation will improve the efficiency / housekeeping of the area under review.
Good Practice	Implementation will contribute to the general effectiveness of control.
Important	Implementation will raise the level of assurance provided by the control system to acceptable levels.
Critical	Addresses a significant risk, impacting on the objectives of the area under review.



# Internal Audit Report

## Finance & Resources

### Non Domestic Rates (A0082/2021/001)

Date: August 2021

#### COMMITTEE SUMMARY

Audit Objectives
<p>The objectives of the audit were to ensure that:</p> <ol style="list-style-type: none"> <li>1. There is an adequate system in place to ensure the calculation and payment of non-domestic rates.</li> <li>2. All exemptions and discounts have been properly applied.</li> <li>3. All NDR income due is properly accounted for and recorded on the system.</li> <li>4. All accounts have been issued in line with statutory timescales.</li> <li>5. All income due to East Renfrewshire Council has been remitted to their bank account.</li> <li>6. Outstanding debt at the year-end is being appropriately managed.</li> </ol>
Audit Scope
<p>The following work was carried out:</p> <ol style="list-style-type: none"> <li>1. Interviewed the appropriate officers to ascertain the systems in place in relation to billing, collecting and monitoring NDR income, updating for any recent changes. Identified any areas for improvement.</li> <li>2. Undertook a series of tests to ensure the system is adequate and operating as intended.</li> <li>3. Prepared a certificate for East Renfrewshire Council based on the outcome of this audit.</li> </ol>
Key Audit Assurances
<ol style="list-style-type: none"> <li>1. There is an adequate system in place for the calculation and payment of Non Domestic Rates.</li> <li>2. Demand notices are issued according to statutory timescales.</li> <li>3. All income due to East Renfrewshire Council has been remitted to their bank account.</li> <li>4.</li> </ol>
Key Audit Risks
<ol style="list-style-type: none"> <li>1. If reviews of reliefs granted are not carried out as often as agreed, there is a risk that some reliefs may be incorrect.</li> <li>2. If higher value refunds are not authorised by staff at an appropriate level, there is a risk that refunds can be paid incorrectly.</li> <li>3. If there are delays in refunding ratepayers, those ratepayers' cashflow could be adversely affected.</li> </ol>

# Internal Audit Report

## Finance & Resources

### Non Domestic Rates (A0082/2021/001)

Date: August 2021

#### Overall Audit Opinion

The audit identified that satisfactory controls are in place for the billing and collection of NDR. As a result of the pandemic, there have been delays in reinstating reviews of reliefs which have been previously awarded. There were also some examples noted where high value refunds were not authorised by staff at an appropriate level and on some occasions there was a delay between the date refunds were requested and the dates they were paid. Recommendations have been made in this report to address these areas and, once implemented will help strengthen the controls in place for NDR. It should be noted that no audit testing has been undertaken on outstanding debt procedures as there has been a temporary cessation of following up outstanding debts due to the impact of the COVID pandemic on businesses.

#### Management Commentary

The task of reviewing reliefs has been transferred to the newly formed Reliefs Team and this work will commence as soon as the Review Officers are in post. In relation to refunds, the process document has been updated and will be issued to all processing staff. The delay in issuing refunds was due to the pandemic priority workload for operational service staff and we are now endeavouring to reduce the outstanding refund requests.

# Internal Audit Report

## Finance & resources

### Management of ICT Systems (B0073/2021/001)

Date: September 2021

#### COMMITTEE SUMMARY

Audit Objectives
<p>The objectives of this audit were to ensure that:</p> <ol style="list-style-type: none"> <li>1. There is an adequate system in place to oversee the transfer of software applications from services to centralised ICT management as part of the Application Lifecycle Management Project.</li> <li>2. The project is progressing within the intended timescales.</li> <li>3. There is clarity over the roles and responsibilities of ICT and services as defined in the RACI Matrix.</li> <li>4. The applications are being managed in accordance with the RACI Matrix and the arrangement is operating effectively.</li> <li>5. Contracts in place are fit for purpose and represent best value for the Council.</li> <li>6. Maintenance agreements are effective and are budgeted for.</li> </ol>

Audit Scope
<p>The following work was carried out:</p> <ol style="list-style-type: none"> <li>1. Interviewed the appropriate officers to ascertain the arrangements in place to manage software applications centrally and to ascertain the progress of the project.</li> <li>2. Selected a sample of 5 applications which are now managed centrally and carried out a series of tests to ensure roles and responsibilities are operating as intended and the project is meeting its objectives.</li> </ol>

Key Audit Assurances
<ol style="list-style-type: none"> <li>1. There is an adequate system in place to oversee the transfer of software applications from services to centralised ICT management.</li> <li>2. The roles and responsibilities of ICT and services are outlined clearly in the Support Model for each application.</li> <li>3. Action is being taken to ensure that applications are being managed in accordance with individual Support Models.</li> <li>4. Fit for Purpose Reviews are carried out by ICT officers to ensure that applications are meeting expectations and achieving best value.</li> <li>5. Maintenance agreements are effective and are accounted for in the ICT budget.</li> </ol>

Key Audit Risks
<p>There are no key risks to report.</p>

Internal Audit Report  
Finance & resources  
Management of ICT Systems (B0073/2021/001)

Date: September 2021

Overall Audit Opinion
The audit review highlighted that there is an adequate system in place in relation to the centralisation of software applications backed by individual Support Models. The auditor noted that some annual reviews had not taken place timeously, however action has been taken to address this issue and a recommendation has been made to make the process more robust.

Management Commentary
Management regularly reviews the progress of the reviews and is aware of the delays which are due to the resources available in the team and the other demands placed on them.



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

**On: 25 October 2021**

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**Report by: Chief Auditor**

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**Heading: Internal Audit and Counter Fraud Progress and Performance for Period to 30 September 2021**

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**1. Summary**

- 1.1 The Internal Audit Annual Plan was approved by the Audit, Risk and Scrutiny Board on 22 March 2021. Internal Audit measures the progress and performance of the team on a regular basis using a range of performance indicators. This report monitors progress from 1 April 2021 to 30 September 2021, in terms of the delivery of the Audit Plan for the year and compares actual performance against targets set by the Director of Finance and Resources.
- 1.2 In terms of Counter Fraud, no formal performance targets for fraud investigation have been established for the following reasons. A major part of their work involves being the single point of contact for DWP's Single Fraud Investigation Service and the Service Level Agreement for this work contains time targets for completing this work. A great deal of effort has also been on increasing fraud awareness amongst employees to prevent fraud from occurring against the Council. The types of fraud referrals received to date are wide ranging and the team's objective is to concentrate on investigating those referrals considered to contain the greatest fraud risk.
- 1.3 As a result of the COVID-19 Pandemic, Joint working with the DWP's Single Fraud Investigation service had ceased and we have now been informed that some of their fraud work is recommencing. All of the Counter Fraud Team are currently working at home although any necessary site/home visits have recommenced.

- 1.4 The Internal Audit team are also home working full time and are continuing to work on planned audit assignments and providing advice and support where necessary to council services.
- 1.5 The report details progress against local and national initiatives involving Internal Audit and the Counter Fraud Team from 1 April 2021 to 30 September 2021.

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## 2. **Recommendations**

- 2.1 Members are invited to note the Internal Audit and Counter Fraud Team progress and performance to 30 September 2021.

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## 3. **Background**

- 3.1 The progress and performance of the Internal Audit Team is subject to regular monitoring using a number of performance measures. The Director of Finance and Resources has set annual targets for the team to demonstrate continuous improvement. In terms of the Counter Fraud team, there are time targets in place for responding to requests from the DWP's Single Fraud Investigation Service. Due to the diverse nature of fraud referrals no formal performance targets have been established and the outcomes from investigations is regularly monitored by management.
- 3.2 Internal Audit and the Counter Fraud Team support a variety of local and national initiatives through participation in professional practitioner groups and co-ordination of national initiatives such as the National Fraud Initiative.
- 3.3 This report measures the progress and performance of both the Internal Audit and Counter Fraud Team for the period from 1 April 2021 to 30 September 2021.

## 4. **Internal Audit Team Performance**

- (a) **Percentage of audit plan completed as at 30 September 2021**

This measures the degree to which the Audit plan has been completed

Actual 2020/21	Annual Target 2021/22	Audit Plan Completion Target to 30 September 2021	Audit Plan Completion Actual to 30 September 2021
94.5%	95.0%	42.8%	43.3%

Actual performance is currently ahead of target.

**(b) Percentage of assignments complete by target date**

This measures the degree with which target dates for audit work have been met.

Target 2021/22	Actual to 30 September 2021
95.0%	100%

Actual performance is ahead of the target set for the year. It should be noted that target dates have been extended where necessary as it is taking longer to obtain information due to the priorities of services during the pandemic and the practicalities of home working.

**(c) Percentage of audit assignments completed within time budget**

This measures how well the time budget for individual assignments has been adhered to.

Target 2021/22	Actual to 30 September 2021
95.0%	100%

Actual performance is ahead of the target set for the year, although this is likely to reduce over the remainder of the year.

**(d) Percentage of audit reports issued within 6 weeks of completion of audit field work**

This measures how quickly draft audit reports are issued after the audit fieldwork has been completed.

Target 2021/22	Actual to 30 September 2021
95.0%	100%

Actual performance is ahead of the target set for the year, although this is likely to reduce over the remainder of the year.

## **5. Review of the 2021/22 Internal Audit Plan**

- 5.1 All of our staff are currently home working and utilising the Council's various tools to continue to undertake audit assignments. However, where it is necessary to check paper documentation at Council

locations for any of our audits, this has been agreed and arranged with Service Managers.

- 5.2 Our 2021/22 Audit Plan is subject to regular review in light of any risks arising from COVID-19 and also to determine whether any assignments will have to be amended or cancelled as result of being unable to visit certain premises. No amendments or cancellations to our planned assignments are deemed necessary at this stage. However, it is worth noting that we have had to transfer time from our investigation time budget to our contingency budget and if further contingency work is required, this may lead to future audit plan amendments being submitted for approval to this Board. There are several reasons for this. Specifically, that some of last year's assignments took longer than planned and had to be carried forward into this year due to the revised working arrangements and priorities of both client and our own staff and also that management have requested our involvement in a number of additional reviews which will be reported to this Board upon completion.

## **6 Counter Fraud Team Progress and Performance**

- 6.1 In line with the Service Level Agreement, the Counter Fraud Team act as the Single Point of Contact (SPOC) to route potential housing benefit fraud referrals to the DWP, liaise with the Council's Housing Benefit Team and DWP Fraud Officers and retrieve the necessary evidence for the DWP Fraud Officers from the Housing Benefit System. In addition, we also work jointly work with DWP Fraud Officers on criminal fraud investigations which focuses on the investigation and prosecution of the LA administered Council Tax Reduction Scheme (CTRS) and Social Security benefit fraud. We have now been informed that some of DWP's Fraud work has now recommenced but we have had no joint working invitations to date. We continue to refer potential fraudulent cases on to them.
- 6.2 During this quarter, we have continued to investigate matches identified by the National Fraud Initiative and review any potential fraudulent COVID-19 business grant claims received.
- 6.3 The financial and non-financial results for the period (April 2021 to September 2021) are noted in the table below. This includes the savings and recoveries associated with work which was undertaken, in conjunction with the Economic Development Team on potentially fraudulent business grants claims.

<b>Financial Outcomes</b>	<b>Period to 30 September 2021 (£)</b>
Cash savings directly attributable to preventative counter fraud intervention	426,600
Cash recoveries in progress directly attributable to counter fraud investigations	130,806



Housing Benefit savings directly attributable to counter fraud investigation	33,876
Notional savings identified through counter fraud investigation, (e.g. housing tenancy and future council tax)	219,228
<b>Non-Financial Outcomes</b>	<b>Period to 30 September 2021</b>
Housing properties recovered	2
Housing applications amended/cancelled	7
Blue badge misuse warning letters issued	0
Licences revoked	0

- 6.4 We are currently developing a process manual documenting our in-house process to administer the National Fraud Initiative and investigate the matches received.

## 7. Local and National Initiatives

### National Fraud Initiative

- 7.1 Reviews of National Fraud Initiative matches received by the Council are being co-ordinated by a Counter Fraud Officer and this work has been split between Counter Fraud and Service Staff. Due to the suspension of the DWP Joint Working, the Counter Fraud Staff have been able to progress this work quickly and to date the following results have been achieved as a result of this exercise:-

<b>Financial Outcomes</b>	<b>Period to 30 September 2021 (£)</b>
Cash recoveries in progress	127,648
Notional savings identified through counter fraud investigation, (e.g. housing tenancy and cancellation of Blue Badges)	1,157,865

The notional savings figure includes the cancellation of 206 Blue Badge Parking Permits as the holders are now deceased.

### Scottish Local Authorities Chief Internal Auditors' Group

- 7.2 The Local Authorities Investigation Sub-Group met in August. A presentation from representatives of the Insurance Financial Investigation Group regarding its use as a tool for evidence and investigation matching was received.
- 7.3 The Computer Audit Sub-Group also met in August and received a presentation from an ICT representative of the Scottish Environment Protection Agency on cyber security attacks.

## External Quality Assessment

- 7.4 The Public Sector Internal Audit Standards requires that an External Assessment should be undertaken on the Internal Audit Service at least every 5 years to ensure conformance with the definition of Internal auditing and the standards, along with an evaluation of whether internal auditors comply with the code of ethics.
- 7.5 Our second assessment is scheduled to be undertaken during 2021/22 by the Chief Auditor at South Ayrshire Council and the results along with any actions will be reported to this Board
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## Implications of the Report

1. **Financial** - The Council has in place arrangements to recover the any overpayments identified from the work of the Counter Fraud Team and the National Fraud Initiative.
2. **HR & Organisational Development** - None
3. **Community Planning – Safer and Stronger** - effective internal audit is an important element of good corporate governance.
4. **Legal** - None
5. **Property/Assets** - None
6. **Information Technology** - None
7. **Equality & Human Rights** - None
8. **Health & Safety** – None
9. **Procurement** - None
10. **Risk** - The progress and performance reported relates to the delivery of the risk-based internal audit plan and the mitigation of the risk of fraud and error.
11. **Privacy Impact** – None
12. **COSLA Implications** – None
13. **Climate Risk** - None

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**Author:** Karen Campbell – 07768354651





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

**On: 25 October 2021**

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**Report by: Chief Executive**

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**Heading: 2020/21 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 2020 to 31 March 2021 and performance on key indicators, as well as highlighting improvements made to the complaints handling procedure (CHP) over the past year to ensure that complaints are handled well, and the organisation learns from them and improves services.
- 1.4 2020/21 has been a year of unprecedented challenges due to the COVID-19 pandemic, with no service being untouched by changes to service delivery and with a range of new services requiring to be delivered in response to restrictions in place. It is recognised by the SPSO and Councils that the pandemic also had an impact on complaints handling, as many staff who are responsible for complaints handling were redeployed to critical response work, or provided advice on new services, grants or support available. Despite the significant challenges of the pandemic, services have continued to strive to resolve complaints and support customers through the process, as a result performance for

complaints handling has remained comparatively stable over 2020/21, which is a credit to our committed workforce.

1.5 The key messages highlighted in the report are as follows:

- 6,179 complaints were received in 2020/21, which has decreased from 7,294 in 2019/20
- 84.1% of our complaints are dealt with as frontline response, demonstrating the Council's commitment to getting it right first time in response to complaints (86.8% in 2019/20)
- 73% of frontline complaints and 74.8% of investigation complaints received were completed within target timescales (72% and 87% respectively in 2019/20)
- the average time to respond to frontline complaints was 10 days, which is above the SPSO target of 5 days, further information is provided in section 6 of the report
- the average time to respond to an investigation complaint was 15 days, which is within the SPSO target of 20 days
- 2020/21 breakdown of complaints received by services is 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 all local authorities were required to implement by April 2021
- 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
- over the Summer the SPSO issued a Performance Indicators framework for consultation, as part of the revised model complaints handling procedure (MCHP).

1.6 A performance scorecard has been included within the appendix of this report to provide additional data. The performance indicators that have declined in performance for 2020/21 will be further explored and monitored, working closely with services to identify where additional support and guidance is required.

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## 2. Recommendations

- 2.1 It is recommended that members of the Audit, Risk and Scrutiny Board:
- Note the content of this report

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## 3. Background

- 3.1 Renfrewshire Council's complaint handling procedure 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, and has been reviewed to include updated guidance over the years.

- 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 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:

#### **Frontline Response**

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.

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.**

**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.**

#### **Investigation**

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.

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.**

**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, this will most likely require the 20 day timescale.**

- 3.5 In line with other authorities, our 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 are treated and investigated as bullying incidents - by the education establishment; and a compensation claim for personal injury, loss of or damage to property - are processed through the Council's standard 'Public Liability Claim Form'.

- 3.6 As there is no longer a standalone Social Work Model Complaints Handling procedure from the SPSO, social work complaints are handled as part of the SPSO Local Authority procedure, the data for these services are included in the service charts below. The 77 complaints across social work services relate to services provided by Children's Services and the Health and Social Care Partnership (HSCP), Social Work Children's Services received 40 complaints, and the HSCP received 37 complaints.

#### 4. Revised national guidance 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 one year to implement these national changes (1 April 2020 to 1 April 2021), the key changes to the statutory model are set out below:
- a new outcome to a complaint has been 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. From January 2021, the focus has been on communicating these national changes to staff. The Council's complaints policy has been updated to reflect these changes with additional guidance provided to staff.

#### 5. Impact of the COVID-19 pandemic on complaints handling

- 5.1 Nationally, the COVID-19 pandemic has had an impact on complaints handling and it is recognised by Councils that many staff who are responsible for complaints handling were redeployed to critical response work, or provided advice on new services, grants or support available. Despite the significant challenges of the pandemic, services have continued to strive to resolve complaints at frontline, they have quickly adapted to the roll out of a new complaint system, the Council's statutory requirements were met, and the new MCHP was implemented on time.

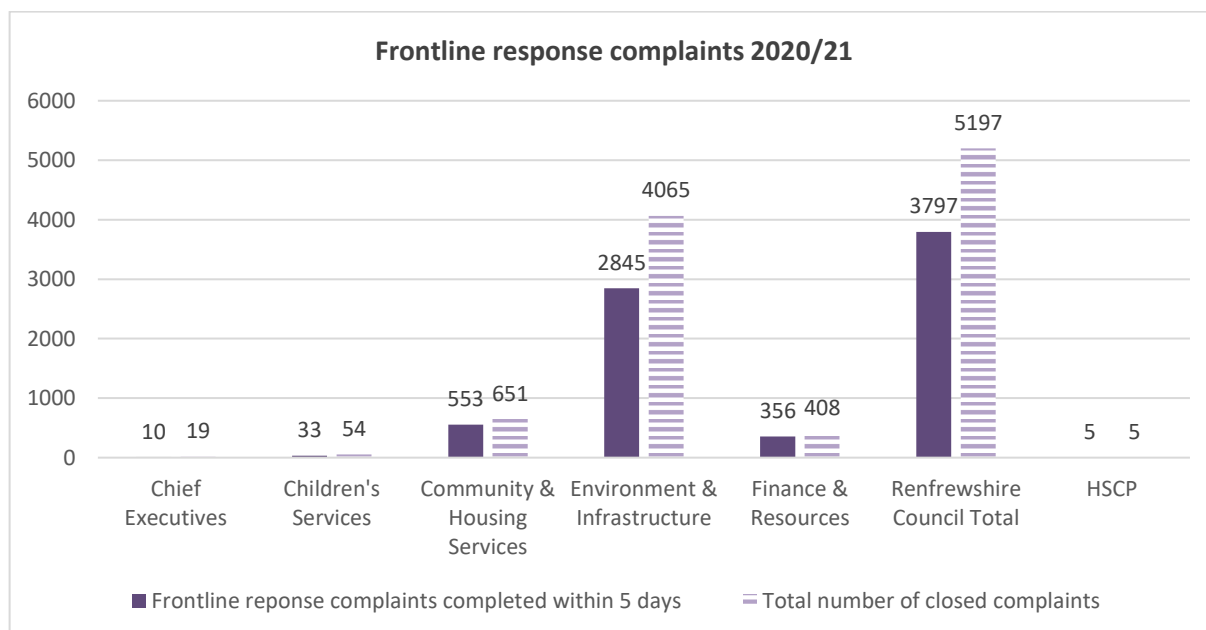


- 5.2 In terms of the impact that the pandemic has had on the Council's complaints handling for 2020/21, some areas to note are:
- **variation in quarterly data** – during the first lockdown, there was a 53% decrease in number of complaints received in quarter 1, April to June 2020, than with the previous year's quarter (for quarter 1 in 2019/20 the Council received 1,780 complaints compared to 882 received for quarter 1 in 2020/21). However, for quarter 4, January to March 2021, the Council received almost 1,000 more complaints than the previous year's comparator quarter.
  - **channel shift**– during lockdowns/tier 4 restrictions there was a notable channel shift by customers, with an increase of complaints made directly through a customer's MyAccount. For April 2020 this represented 43% and for January 2021 this was 37% of all complaints logged, yet when restrictions eased this decreased and there was an increase through the Customer Service Unit to log complaints.
  - **targets** – the SPSO made no changes to the statutory targets for the complaints handling procedure during the initial stage of the pandemic, this was in contrast to the Information Commissioner who extended the provision for FOIs from 20 working days to 60 working days for April and May 2020. The Council also received an increase in complex investigation complaints, and as such there was a decrease in investigation complaints completed within the target of 20 days from 87% in 2019/20 to 74.8% for 2020/21.
  - **escalation and extension** – the SPSO reminded public bodies that the 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 2020/21, there was a significant increase in applying an agreed extension as a percentage of all complaints closed at investigation, for 2019/20 this was 0.03% and this increased to 9% or 81 complaints for 2020/21 (9% extension for investigation complaints is in line with the Scottish average position).
- 5.3 When reviewing 2021/22 performance these factors are actively being considered to identify any trends and comparisons.

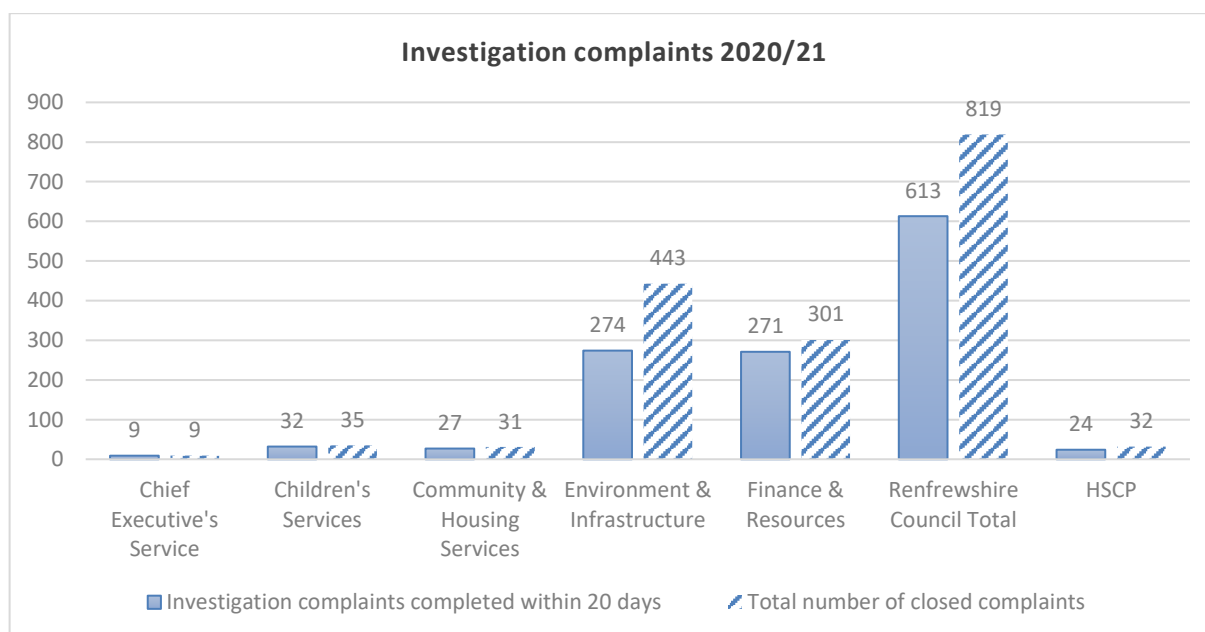
## 6. 2020/21 Council Performance

- 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 2020 to 31 March 2021 and Appendix 1 details Renfrewshire Council's complaints performance for 2020/21 against these key SPSO performance indicators.
- 6.2 With the new complaints system, launched in April 2020, all Council services (with the exception of schools) logged 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 comparisons between years should be treated with caution.
- 6.3 In 2020/21, the number of complaints received decreased from 7,924 to 6,179. This reduction is likely to be attributed to the impact of the COVID-19 pandemic, which has affected both the number of complaints being received, and the nature of complaints.

- 6.4 The Council strives to ensure that complaints are answered correctly first time and that customers are responded to quickly, and during 2020/21 84.1% of complaints were addressed through a frontline response. 73% of frontline complaints and 74.8% of investigation complaints received were completed within target timescales, this compares with 72% and 87% respectively in 2019/20.
- 6.5 The average time to respond to an investigation complaint was 15 days, which is within the SPSO target of 20 days. As highlighted in previous reports, prior to April 2020, both Environment and Infrastructure and Children's Services used a different system and therefore the Council's average time to complete frontline and investigation complaints performance indicators did not previously include these service areas. Since all services have now moved to use the new system this has resulted in a significant increase in the indicator for frontline complaints - the average time to respond to a frontline response complaint was 10 days, which is above the SPSO target of 5 days. The reasons for the increase in days to respond are being explored and early indications suggest a mixture of longer response times, the impact of COVID-19 both on service provision and on back-office functions and also the roll out of this new system to a high-volume service. Performance for 2021/22 has improved so far, for quarter 1 (April to June 2021) the average time to respond to a frontline response complaint was 5.15 days.
- 6.6 The bar charts below show the service breakdown of total complaints received and those closed within the timescales, during the period 1 April 2020 to 31 March 2021. This is for both frontline response and investigation complaints. The complaints for social work services are included in services provided by Children's Services and the Health and Social Care Partnership (HSCP), whilst the data for the Chief Executive's Service also includes those complaints directly to the Chief Executive. The data for the HSCP has been included in the below bar charts, yet it is excluded in the total Renfrewshire Council position and in the scorecard at appendix 1.



- 6.7 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, 92,000 households and businesses, collects 155,000 bins each week 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 2020/21, due to a strengthening of the complaints process within the service.



- 6.8 For the indicators that have declined in performance, the reasons will continue to be explored to understand the trends and the impact of COVID impact over time, working closely 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.
- 6.9 Within the capabilities of the new complaints system, customers can also provide comments and compliments. During 2020/21, some of these were in relation to services the Council continued to provide during lockdown or new services/support that were provided during the pandemic. A few examples of these compliments are provided below:
- "Just to say a very BIG thank you to our Refuse Collectors. Thanks for your prompt service in lifting my missed Brown Bins. And also, for continuing to provide a service during this crisis."
  - "Thank you so much for your time and effort for helping me with my Small Business Bonus Scheme (SBBS) grant application. I really appreciate your help. The staff were kind and very approachable. Thank you."
  - "I would like to thank all the employees who are continuing to work throughout this difficult period in order to support Council services. They are doing a fantastic job."

- “With care and social distancing they just got on with the work [housing repair], keeping us fully informed of what was happening and reassuring us that the problem would be resolved asap, to which they did. All of their team were so helpful. We can't thank them enough.”

## **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 not on MyAccount 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. Furthermore, it was also agreed to postpone the roll out of the new system to schools and an interim process remains in place.
- 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.
- 7.4 Learning and benchmarking opportunities have continued to be pursued through the Local Authority Complaint Handlers Network (LACHN) and regular meetings with the complaint system supplier occur to identify future developments for the system. The Complaints Development and Review Group continue to meet to identify where additional support and guidance is required, training and learning opportunities for services, and discuss and consult on national developments.

## **8. New statutory developments**

- 8.1 In line with the revised Model Complaints Handling Procedure, the SPSO circulated draft complaints performance indicators for consultation in June 2021. These consist of five core indicators (which are broadly in keeping with the indicators currently reported) and three recommended indicators, which include raising awareness, staff training and customer satisfaction. In conjunction with the internal Complaints Development and Review Group, a response to the consultation has been sent to the Local Authority Complaints Handlers Network who will draft a response to the SPSO on behalf of all Local Authorities. Once the consultation is complete and the indicators published, these will be used to monitor performance for 2021/22 data collection.
- 8.2 In preparation for collating this new return, work is underway to measure the complaints training accessed by employees, either through internal channels (such as the iLearn course), or through external sources. This will also provide an opportunity to develop a programme of training courses and materials that can be shared with officers to continue their professional development in this key area of service delivery.

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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:  
  
Working together to improve outcomes – 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. If required following implementation, the actual impact of the recommendations and the mitigating actions will be reviewed and monitored, and the results of the assessment will be published on the Council's website.
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:** Draft 'SPSO Key Performance Indicators for the Model Complaints Handling procedure'

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**Author:** *Nicola Irvine-Brown, Chief Executive's Services*

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



The total number of complaints received, frontline and investigation	2018/19	2019/20	2020/21
Total number of complaints received ( <b>open and closed</b> )	8,200	7,924	6,179
Number of complaints <b>closed</b> at Frontline Response as a percentage of all complaints	89.1%	86.8%	84.1%
Number of complaints <b>closed</b> at Frontline Response	7,307	6,879	5,197
Number of complaints <b>closed</b> at Investigation	893	1,045	819
Number of complaints <b>closed</b> at Investigation as a percentage of all complaints	10.89%	13.2%	13.2%
Number of complaints <b>closed</b> at Investigation after escalation	7	3	81
Number of complaints <b>closed</b> at Investigation after escalation as a percentage of all complaints	0.8%	0.03%	1.31%
The average time in working days for a full response to complaints at each stage	2018/19	2019/20	2020/21
Average time in working days to respond to complaints at Frontline Response	5.3*	3.3 *	10

<b>The average time in working days for a full response to complaints at each stage</b>	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>
Average time in working days to respond to complaints at Investigation	15*	13.3*	15
Average time in working days to respond to complaints after escalation	9*	11 *	10

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

<b>The number and percentage of complaints at each stage which were responded to in full within the set timescales</b>	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>
Number of complaints closed at Frontline Response within 5 working days as a percentage of the total number of Frontline Response complaints	77.5%	72%	73%
Number of complaints closed at Investigation within 20 working days as a percentage of total number of Investigation complaints	73.9%	87%	74.8%

<b>The number and percentage of complaints where an extension to the timescale has been authorised</b>	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>
Number of complaints closed at Frontline Response where extension was authorised, as a percentage of all complaints at Frontline Response	0.2%*	0.0%*	0.0%
Number of complaints closed at Investigation where extension was authorised, as a percentage of all complaints closed at Investigation	0.6%*	0.03% *	8.96%

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







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

**On:** 25 October 2021

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**Report by:** Lead Officer

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**Heading:** Review of Bus Deregulation and Effect on Transport Services in Renfrewshire

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## 1. Summary

- 1.1 The Audit, Risk and Scrutiny Board of 28 May 2019 agreed the purpose and scope of a review on bus deregulation and the effect on transport services within Renfrewshire.
  - 1.2 Findings of the review were presented to the Board over a period of months during 2019 and early 2020. The Covid-19 pandemic resulted in significant changes to the landscape of public transport and the Board of 24 August 2020 agreed to continue the review until the impact of the pandemic and future operation of bus services could be considered.
  - 1.3 This reports seeks to update the Board on the operation of bus services during the pandemic and the early stages of recovery, developments over this period and progress in relation to the bus service provisions of the Transport (Scotland) Act 2019.
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## 2. Recommendations

- 2.1 It is recommended that the Board:
  - (i) Notes the information presented at this stage of the review;

- (ii) Notes the next stage of the review.
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### **3. Background**

- 3.1 The report approved by the Board on 28 May 2019 set out the context for the review and steps to be undertaken. Review findings were reported to the Board over several months during 2019 and early 2020, considering existing legislation and the perspectives of the Regional Transport Partnership (SPT), commercial operator McGills, Bus Users Scotland, Unite the Union and community representatives.
- 3.2 The Board of 24 August 2020 agreed to continue the review until the impact of the pandemic and future operation of bus services could be considered.

### **4 Bus Services During the Pandemic**

- 4.1 The delivery of public transport and particularly bus services changed significantly in the early phases of the pandemic. Research undertaken by Transport Scotland indicates that during initial lockdown restrictions in March 2020 bus services were reduced to around 40% of normal operations, with patronage declining to 15% of pre covid levels<sup>1</sup>. At this stage, resources were focused on the provision of essential services to support key workers.
- 4.2 In line with the Scottish Government's pandemic recovery 'route map'<sup>2</sup>, services increased gradually to 70% of pre covid levels by summer 2020 and around 90% by September 2020. It should be noted that services operated at significantly reduced capacities of 30-40% for much of this period to allow for physical distancing measures.
- 4.3 Passenger numbers have recovered at a slower rate, reaching around 30% of pre covid levels by June 2020 and rising to around 60% in late summer as tourism and leisure sectors re-opened. The level of 60% broadly remains the position at present and longer term projections continue to be unclear, particularly in view of wider uncertainties relating to the impact of the pandemic on retail and office sectors.

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<sup>1</sup> Transport Scotland (2020) 'Covid 19: Scotland's Transport and Travel Trends During the First Six Months of the Pandemic' <https://www.transport.gov.scot/media/48971/covid-19-scotland-s-transport-and-travel-trends-during-the-first-six-months-of-the-pandemic.pdf>

<sup>2</sup> <https://www.gov.scot/collections/coronavirus-covid-19-scotlands-route-map/>

- 4.4 The Scottish Government has supported operation of the bus network during the pandemic through emergency grant funding, in view of the significantly reduced demand for services and associated impact on revenues.
- 4.5 The Covid-19 Support Grant has assisted operators to maintain the delivery of essential routes during the early phases of the pandemic and an increased network in view of reduced carrying capacities during later phases. Transport Scotland forecast that £191.5M was provided to support operators between 19 June 2020 and March 2021<sup>3</sup>. At present grant funding is available until 3 October 2021.

## **5 Bus Partnership Fund**

- 5.1 A report to the Infrastructure, Land and Environment Policy Board of 26 August 2020 provided members with an update on public transport during the pandemic and the steps being progressed to support recovery, including the preparation of proposals for bus priority infrastructure which could form the basis of funding bids.
- 5.2 In late 2020 Transport Scotland launched the Bus Partnership Fund. The competitive fund seeks to complement the provisions of the Transport (Scotland) Act 2019, enabling transport authorities to work in partnership with operators to deliver bus priority measures, improving journey times and reliability.
- 5.2 A bid for the Glasgow City Region, including Renfrewshire, was prepared in spring 2021 through the Glasgow Bus Partnership, representing commercial operators, local authorities, SPT, community transport and Bus Users Scotland. The City Region bid has secured £3.655M from the fund<sup>4</sup> of which £2M will support the development of bus priority measures within Renfrewshire. Further detail of the proposals will be reported to the Infrastructure, Land and Environment Policy Board later this year.

## **6 Bus Provisions of Transport (Scotland) Act 2019 – Consultation**

- 6.1 The Director of Environment and Infrastructure updated the Council meeting of 24 June 2021 on the provisions of the Transport (Scotland) Act 2019 relating to bus services. The report noted that provisions had been delayed significantly as a result of the pandemic and that a consultation in relation to the specific guidance and regulations was awaited to allow consideration of their impact.

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<sup>3</sup> <https://www.transport.gov.scot/public-transport/buses/covid-19-support-grant/>

<sup>4</sup> [https://www.spt.co.uk/media/mdijzb5t/sp270821\\_agenda8.pdf](https://www.spt.co.uk/media/mdijzb5t/sp270821_agenda8.pdf)

- 6.2 In July 2021 Transport Scotland issued a consultation on the implementation of Part 3 of the Transport (Scotland) Act 2019, relating to bus services. The Council's response to the consultation, which closes in October 2021, will be reported to a future meeting of the Infrastructure, Land and Environment Policy Board and inform this review.

## **6 Next Steps**

- 6.1 The bus industry remains in state of flux as a result of the pandemic, new funding streams such as the Bus Partnership Fund and consultation on the provisions of the new Transport (Scotland) Act 2019. This is likely to continue in the short to medium term and at this stage it is difficult to provide a clear assessment of the likely future implications for bus services within Renfrewshire.
- 6.2 Progress in relation to funding streams and outcomes of consultation on the new provisions of the Transport (Scotland) Act 2019 are anticipated in late 2021/early 2022 and will be reported to the next appropriate meeting of the Board as part of a paper which summarises the outcomes of the review.

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## **Implications of the Report**

1. **Financial** - None
2. **HR & Organisational Development** - None
3. **Community/Council Planning** – None
4. **Legal** - None
5. **Property/Assets** - None
6. **Information Technology** - None
7. **Equality & Human Rights** - None
  - (a) 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. If required following implementation, the actual impact of the recommendations and the mitigating actions will be reviewed and monitored, and the results of the assessment will be

published on the Council's website.

- 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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