

## Connected Communities Executive Advisory Panel

21<sup>st</sup> June 2024

<b>Report Title</b>	<b>Feedback on updated North Northamptonshire Council Comments, Compliments and Complaints Policy</b>
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<b>Are there public sector equality duty implications?</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Does the report contain confidential or exempt information (whether in appendices or not)?</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Applicable paragraph number/s for exemption from publication under Schedule 12A Local Government Act 1972</b>	N/A
<b>Which Corporate Plan priority does the report most closely align with?</b>	Modern public services

### List of Appendices

**Appendix A** – North Northamptonshire Comments; Compliments and Complaints Policy

**Appendix B** – Complaints Handling Code

**Appendix C** – Housing Complaint Handling Code

**Appendix D** – Complaint Handling Code self-assessment

### **1. Purpose of Report**

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- 1.1. The purpose of this report is to seek feedback, agreement and sign off on the revised [North Northamptonshire Council 'Comments, Compliments and Complaints policy'](#), to be presented to Executive on 11<sup>th</sup> July 2024.

### **2. Executive Summary**

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- 2.1. The current policy was drafted by Future Northants for implementation when the new unitary Council was created and signed off by the Shadow Executive. A review is now required to ensure the policy reflects North Northamptonshire Council working practices and experiences and embodies the values of North Northamptonshire Council. New statutory changes, following an external joint consultation with the Local Government & Social Care Ombudsman (LGSCO), and Housing Ombudsman Service (HOS), have also been incorporated into the

policy. This results in the proposed revision and better addresses experiences and needs of customers and North Northamptonshire Council.

### **3. Recommendations**

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3.1. It is recommended that the Connected Communities Executive Advisory Panel provides feedback and consideration to the attached policy, in anticipation of it being presented to the Executive on 11<sup>th</sup> July 2024.

#### 3.2. Reasons for Recommendations

- The current policy confirming how the Council will manage feedback was drafted under the Future Northants programme board and adopted by the Shadow Executive. It is recommended that policies are reviewed regularly to reflect the environment the authority operates in and where statutorily required to do so, by the HOS and LGSCO complaint handling codes. This is an aligned code, which means as a landlord, the Council can provide a coordinated complaint handling code and response to feedback.
- The Council embraces feedback, positive and negative and aspires to learn and shape service provisions off the back of it. A robust policy should provide clarity on the themes of feedback and how they will be recorded and/or acted on, aiding development of a positive complaint and learning culture. This policy also links in with new Remedy Policy and updated Unacceptable Customer Behaviour policy, ensuring the Council has a consistent approach when handling feedback and managing different types of interactions, as well as equipping officers with consistent and reliable guidance.

3.3. Alternative Options Considered: Option to not revise and continue to operate under the policy drafted by Future Northants and signed off and adopted by the Shadow Executive when the new unitary Council was created, therefore delaying the Council's adoption of new statutory practice as set out by the HOS and guidance from the LGSCO.

### **4. Report Background**

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4.1. The Council provides services to over half a million customers each year, across a wide area and varying demographics. It is important that customers can give the Council feedback via a method that meets their needs and is accessible. The complaint handling codes, as set out by the LGSCO and HOS, enables councils to adopt a consistent and streamlined approach, giving customers a platform on which to provide their feedback and seek clarity. It is both advisable and expected to have a policy that is clear on the types of feedback and how poor experiences can be highlighted and acted on to prevent reoccurrence.

4.2. In November 2023, the LGSCO and HOS held a joint consultation with local authorities to gather feedback on changes to the complaint handling codes. The outcome of the consultation was communicated in February 2024, with each

recognised body publishing updated Complaint Handling Codes (**Appendix B and C**).

- 4.3. This was a joint consultation to see whether a single joint single code could be adopted. The outcome, after considering the feedback from local authorities, was to remain separate, but align and share the approach in key areas i.e. complaint response times and oversight.
- 4.4. The LGSCO Complaint Handling code is considered good practice and is recognised as guidance to be adopted. The LGSCO will start using the code as part of its processes from 1<sup>st</sup> April 2026, giving councils time and opportunity to adopt the Code and engagement of key offices and services. Early adoption is encouraged (as soon as we can do so).
- 4.5. The HOS Complaint Handling Code became statutory on 1<sup>st</sup> April 2024, and as a landlord, the Council is legally obliged to follow it.
- 4.6. Complaint handling for Adult Social Care and Children's Services falls under separate governance and legislation, this is outlined in the policy under **Appendix 1 and Appendix 2**
- 4.7. The policy has been reviewed by the customer experience team and shared with key stakeholders to ensure a robust consideration of engagement.
- 4.8. The policy will inform consistent management of feedback and proactive steps to learn from feedback and track benefits in real time

## **5. Issues and Choices**

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- 1.1. The existing policy was drafted by Future Northants for implementation when the new unitary Council was created and signed off by the Shadow Executive. It is now time to review and revise the Council's policy to ensure it best suits the needs of North Northamptonshire Council and is informed by experience and evolved working practice, alongside the statutory and recognised complaint handling codes.
- 1.2. The key changes announced to the complaint handling codes are as follows:
  - Universal definition of a complaint
  - Providing easy access to the complaints procedure and ensuring residents are aware of it, including their right to access the Ombudsman Services
  - The structure of the complaints procedure - only 2 stages necessary and clear times set out for responses
  - Ensuring fairness in complaint handling with a resident-focused process
  - Taking action to put things right and appropriate remedies
  - Creating a positive complaint handling culture through continuous learning and improvement
  - Demonstrating learning in annual reports
  - Annual self-assessment against the codes of practice

- 1.3. The key changes to how North Northamptonshire Council handles stage one and stage two complaints, under the LGSCO Complaint Handling Code, are highlighted below in bold:

<b>Complaint stages</b>	<b>Current published service level agreement (SLA)</b>	<b>New SLA under the Codes</b>
Acknowledgement	3 working days	<b>5 working days</b>
Stage 1 response	20 working	<b>10 working days</b>
Extension to Stage 1	10 working days	10 working days
Stage 2 response	20 working days	20 working days
Extension to Stage 2	20 working days	20 working days

- 1.4. The reduction in working days for stage one complaints will have an impact on services and the way they operate, particularly the Place and Economy and Adults, Health and Partnership directorates. In 2023/24, North Northamptonshire Council handled 2,306 stage one complaints and 68 stage two complaints, a total of 2,374 complaints. Of these, 55% were responded to within the existing published SLA of 20 working days.

- 1.5. A clear engagement plan and support network is being developed as case work is moved onto a digital system the Council uses, called Place Cube, which will store all case types from September 2024. Officers will be engaged on the importance and value of customer feedback and the benefits of tracking learnings and making proactive changes to the way services are delivered, reducing reoccurrences of poor service.

- 1.6. The key changes to how North Northamptonshire Council handles stage one and stage two complaints, under the HOS Complaint Handling Code, are highlighted below in bold:

<b>Complaint stages</b>	<b>Current published service level agreement (SLA)</b>	<b>New SLA under the Codes</b>
Acknowledgement	3 working days	<b>5 working days</b>
Stage 1 response	20 working	<b>10 working days</b>
Extension to Stage 1	10 working days	10 working days
Stage 2 response	20 working days	20 working days
Extension to Stage 2	20 working days	20 working days

- 1.7. Housing Allocations and Housing Repairs will see a reduction in working days for stage one complaints; this will have an impact on how the service operates and steps have been taken to address this including officer triaging and monthly meetings to review case work.

- 1.8. Retention of the current policy was considered; it was determined that a revision provides the opportunity to ensure the policy is reflective of best practice and the experiences and values of North Northamptonshire Council, as well as ensuring we meet its statutory requirements as a landlord.

## **6. Next Steps**

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- 1.9. Feedback will be incorporated and shared, and if approved by the Executive at its meeting on 11<sup>th</sup> July, the draft policy will be adopted and published on the Council's website providing, clear guidance on how to provide feedback and how it will be actioned.
- 1.10. The new policy will be communicated to colleagues in line with the launch of a digital case management system, with training, guidance and support on hand to aid bedding in, from September 2024.
- 1.11. As the HOS code was statutory introduced from 1<sup>st</sup> April 2024, services have already been working with the updated Code, which has been reflected in the services KPI's and reporting.

## **7. Implications (including financial implications)**

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### **7.1. Resources and Financial and Transformation**

- 7.1.1 There are no resources or financial implications arising from the proposals in this report.

### **7.2. Legal and Governance**

- 7.2.1. The draft policy is currently being reviewed by NNC Legal services.

### **7.3. Relevant Policies and Plans**

- 7.3.1. The policy supports our Corporate Plan key commitments to modern public services and connected communities, allowing our customers to have their say, and enabling the Council to improve the customer experience.
- 7.3.2. This proposed policy will help embed a positive culture on feedback handling and relationship building between our officers and customers.

### **7.4. Risk**

- 7.4.1. There are no significant risks from the proposals in this report. The proposed policy revision reduces inconsistencies with how we handle customer feedback, ensuring we are in line with other local authorities and the complaint handling codes, resulting in increased customer trust and satisfaction.
- 7.4.2. The proposed revised policy provides clarity on the types of feedback and how they can be made and refers to unacceptable behaviour and how it will be managed to support robust and timeous management and increase transparency.

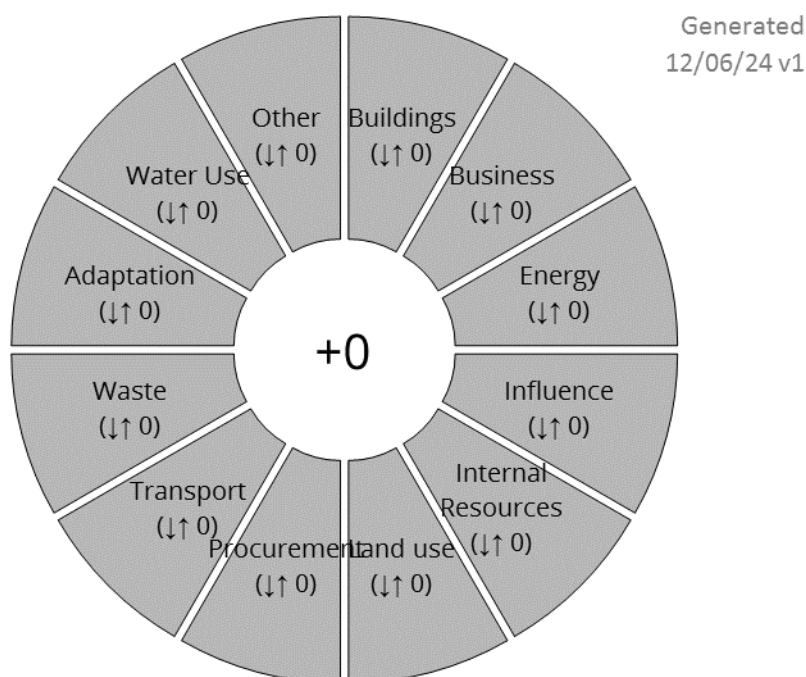
## 7.5. Consultation

- 7.5.1. External consultation on the complaint handling codes was undertaken by the HOS and LGSCO, in November 2023, and the outcomes confirmed to local authorities in February 2024. This resulted in a number of statutory changes and guidance, which have been highlighted under section 4 and 5 of this report.
- 7.5.2. Engagement took place with our colleagues at West Northamptonshire Council on the Children's Services appendix and wider sharing of our draft policies in light of the changes to the complaint handling codes.
- 7.5.3. Engagement took place with our Adult Social Care colleagues on the Adult's appendix, taking into account their governance under The Local Authority Social Services and National Health Service Complaints (England) Regulations 2009 and The Care Act, 2014.
- 7.5.4. Consultation and engagement has ensured the policy provides clarity to our customers on how to provide feedback and for our managers to implement consistent processes across their respective service areas to ensure this is handled effectively and within the remit of the Codes.

## 7.6. Equality Implications

- 7.6.1. Equality Screening Assessment confirms no impact to protected groups.

## 7.7. Climate Impact



North Northamptonshire Council has committed to being a carbon neutral organisation by 2030, 5 yrs & 6 mos away.

- 7.7.1. Assessment completed, zero impact. The contents of the policy revision has no direct positive or negative dependencies on NNC's climate response.

7.7.2. The infographic shows the relative costs and benefits of the decision on 11 different categories with respect to the climate: Buildings, no effect. Business, no effect. Energy, no effect. Influence, no effect. Internal Resources, no effect. Land use, no effect. Procurement, no effect. Transport, no effect. Waste, no effect. Adaptation, no effect. Water Use, no effect.

## 7.8. **Community Impact**

7.8.1 No community impacts.

## 7.9. **Crime and Disorder Impact**

7.9.1 Whilst this policy references unacceptable behaviour, this is covered under a separate North Northants Council Policy - Unacceptable Customer Behaviour. Therefore, no crime and disorder impact.

## 8. **Background Papers**

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8.1. Current policy – [North Northamptonshire Council 'Comments, Compliments and Complaints policy](#)

8.2. Equality Screening Assessment