CORPORATE COMPLAINTS POLICY

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This Policy Document can be made available in large print and other formats such as printed on yellow paper, taped, Braille etc. as requested	

1. Policy Statement

1.1 Exeter City Council is committed to delivering high-quality, responsive, and accountable public services. This Corporate Complaints Policy sets out how complaints are managed across all Council services not covered by the Housing Ombudsman and provides the overarching framework for handling complaints in line with the Local Government and Social Care Ombudsman (LGSCO) Complaint Handling Code. It ensures that complaints are handled in a consistent, fair, and transparent way across all relevant service areas.

1.2 This policy aims to:

- Provide a clear and accessible process for making complaints.
- Ensure complaints are handled fairly, promptly, and effectively.
- Promote learning from complaints to improve services.
- Comply with statutory codes and best practice guidance.
- Embed accountability and governance through defined roles and responsibilities.

2. Policy Scope

2.1 This policy applies to all complaints about Council services, within the scope of the LGSCO code of guidance, including those delivered by contractors or partners. Where services are delivered by contractors or partners, the Council remains accountable for complaint handling.

2.2 Where possible, (e.g. timelines, principles etc.), this policy provides greater alignment with the Housing Complaints Policy.

2.3 This policy excludes:

- matters with separate statutory/corporate processes (e.g., planning appeals, statutory reviews of homelessness decisions etc.). Where a statutory complaints or appeals process exists, we will signpost to the correct route and avoid duplicate handling under this policy.
- Complaints about councillor conduct (handled under the Members' Code of Conduct).
- Employment-related complaints (handled via HR procedures).
- Member enquiries, where members are not acting on behalf of a complainant or in a personal capacity.

2.4 Where a complaint includes both corporate and housing issues, we will coordinate a single, coherent response where practicable and explain which Ombudsman has jurisdiction at the end of our process.

3. Principles

3.1 In line with the aims of this policy, the core principles for handling complaints are:

3.2 Accessibility – Whilst the online form is the main method for registering a complaint, we will accept complaints through any channel, including in person and by telephone. Where a complaint is made verbally, we will record it and confirm the details in writing if requested. We will make reasonable adjustments for disabled people and others who need support to access the process, including accepting representatives or advocates, providing information in alternative formats, and offering support to complete forms. Any agreed adjustment will be recorded on the case file and reviewed as the complaint progresses

3.3 Fairness & Respect – The Council will handle all complaints with fairness and respect, ensuring that every investigation is impartial, that any response or remedy is proportionate to the issues raised, and that all communication with complainants is courteous, clear, and empathetic.

3.4 Timeliness – The Council will respond to complaints within clear, published service standards. Where more time is genuinely needed due to the complexity of a case, an extension will only be agreed with the complainant, recorded with a clear reason, and accompanied by a new confirmed due date.

3.5 Transparency & Learning – The Council is committed to being open about how complaints are handled. We will publish annual performance information, including insights from complaints, and use trends, data, and learning to strengthen services and prevent issues from recurring.

3.6 Accountability – The Council will maintain clear roles and responsibilities for complaint handling, supported by strong managerial and political oversight. This includes appointing a designated Member Responsible for Corporate Complaints to ensure effective scrutiny and promote a positive complaints culture.

4. Definitions

4.1 Complaint: An expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the Council or its representatives, regardless of whether the word 'complaint' is used.

4.2 Complainants may make a complaint if they feel we have:

- done something wrong
- behaved unfairly or impolitely
- not carried out a service to an agreed standard
- not responded to their request for a service within our stated timescale

4.3 Service Request: A request for a service or action (e.g., reporting a missed bin or repair). These are not complaints unless there is a failure in delivery, in line with 4.2.

4.4 Housing Complaint: A complaint related to housing services, governed by the Housing Ombudsman Code.

5. Exclusions

5.1 Complaints may be excluded if:

5.2 The issue occurred over 12 months ago and there is no good reason for the delay (unless discretion is applied).

5.3 The matter is, or becomes, subject to legal proceedings or a more appropriate right of appeal (court/tribunal).
5.4 The matter has already been considered under this policy or by the LGSCO
5.5 The complaint is vexatious/abusive or repetitive without new evidence (managed under the Unacceptable Behaviour Policy).
5.6 If excluded, we will explain the reason and signpost the appropriate route.

6. Complaints Handling Process

6.1 An online complaint form is provided. However, any correspondence, through any channel, which meets the definition of a complaint, as outlined in sections 4.1 and 4.2, will be treated as such.
6.2 Where appropriate, the council will seek to achieve early and proportionate resolution of Stage 1 complaints, ensuring issues are addressed quickly and fairly. Where a complaint can be resolved swiftly without a full investigation, we will do so and record the outcome, learning, and any remedy provided. Early resolution will not reduce the quality of our response or the complainant's right to escalate.

6.3 Where we are unable to resolve concerns at an early stage, and further investigation is required, the following procedure will apply:

6.4 Stage One – Initial Response:

- Acknowledgement within five working days.
- Response within ten working days of the acknowledgment, extendable by a maximum of ten working days, unless there is good reason to extend further. Any extension will be clearly communicated and explained to the individual.
- Investigated by the relevant Head of Service or delegated officer.

6.5 A Stage One response will address all points raised in the complaint and will confirm:

- The complaint stage
- A summary of issues raised
- The decision on the complaint
- The findings and reasons for any decisions made
- The details of any remedy offered to put things right
- Details of any outstanding actions
- details of how to escalate the matter to stage two if they are not satisfied with the outcome

6.6 Stage Two – Escalated Review

If all or part of the complaint is not resolved to the individual's satisfaction at stage 1 then the complaint may progress to stage 2, in accordance with the following:

- Reviewed by a senior officer not involved in Stage One.
- Response within twenty working days of the acknowledgement, extendable by a maximum of twenty days, unless there is good reason to extend further. Any extension will be clearly communicated and explained to the individual.
- Investigated by the relevant Director or delegated senior officer.
- Requests will only be declined where they meet this policy's exclusions, (as defined in Section 5 of this policy), and any refusal will include an explanation and signposting to the Ombudsman.

6.7 A Stage Two response will address all points raised in the complaint and will confirm:

- The complaint stage
- A summary of the issues raised
- The decision on the complaint
- The findings and reasons for any decisions made
- The details of any remedy offered to put things right
- Details of any outstanding action
- Details of how to escalate the matter to the Ombudsman if you are dissatisfied with the outcome, with full details of how to contact them.

6.8 Where fault is found, we will apply proportionate remedies that seek to put the individual back in the position they would have been in but for the fault, or otherwise provide a fair outcome. Remedies may include an apology, explanation, practical action, financial redress, and/or service improvements. We will track the completion of agreed remedies and confirm to the complainant when fulfilled.

6.9 Escalation to Ombudsman: If unresolved, or if policy timelines not met, complainants will be provided with the Ombudsman's contact details:

Local Government & Social Care Ombudsman (LGSCO)
Phone: 0300 061 0614
Postal Address: PO Box 4771, Coventry, CV4 0E:
Website: https://www.lgo.org.uk

6.10 For Housing Complaints covered by the Housing Ombudsman code of guidance the contact details are:

Housing Ombudsman Service (HOS)
Phone: 0300 111 3000
Postal Address: PO Box 1484, Unit D, Preston, PR2 0ET
Email (general enquiries): info@housing-ombudsman.org.uk
Website: https://www.housing-ombudsman.org.uk

7. Monitoring and Reporting

7.1 Annual self-assessment against the LGSCO Code of Guidance to Audit and Governance Committee
7.2 Quarterly reporting to Senior Management Board
7.3 Publication of complaints data and learning outcomes.
7.4 Monitoring Officer oversight of governance-related complaints and systemic risks.
7.5 Performance dashboards to track resolution times, escalation rates, and service-level trends.
7.6 Complaints performance will also be discussed at regular cross service complaints review meetings.

8. Policy Review

8.1 This policy will be reviewed in response to changes in legislation, Ombudsman guidance, or organisational priorities
8.2 Reviews will be led by the Head of Service, Customers and Communities and in consultation with the Monitoring Officer and relevant Heads of Service.

9. Roles and Responsibilities

9.1 A Member Responsible for Corporate Complaints will be appointed for complaints covered by this policy. In accordance with the LGOSC Code of Guidance their responsibilities will include:

- Provide democratic oversight of the complaints process
- Scrutinise performance and learning, including trends, timeliness, quality of responses, and service improvements
- Promote a positive complaints culture, treating complaints as valuable feedback

- Ensure transparency and accountability, with clear reporting to Members and the public

9.2 Head of Service – Customers and Communities

- Overseeing the complaints process and ensuring consistency across departments.
- Lead the Corporate Complaints Team responsible for ensuring that the handling of Corporate Complaints is in accordance with this policy and the LGSCO code of guidance
- Monitoring compliance with statutory guidance and internal standards.
- Coordinating responses to complex or cross-cutting complaints.
- Ensure effective communication with the LGSCO on escalated cases, acting as the primary link officer
- Producing quarterly and annual reports on complaint trends, performance, and learning.
- Supporting staff training and development in complaint handling.
- Ensuring that learning from complaints is captured and used to improve services.

9.3 Heads of Service, or delegated officers, are responsible for the investigation of complaints at Stage One. They ensure that complaints are investigated thoroughly and resolved promptly. Key responsibilities include:

- Leading investigations into complaints within their service area.
- Providing clear, evidence-based responses to complainants.
- Identifying service failures and recommending appropriate remedies.
- Ensuring complaints, responses and learning are logged with the Complaints team in Customers and Communities.
- Contributing to service improvement through analysis of complaint themes.
- Supporting staff in understanding and applying the complaints process.

9.4 Directors, or delegated Senior Officers, are responsible for conducting Stage Two reviews. They ensure impartiality and thoroughness in resolving complaints that have not been satisfactorily addressed at Stage One. Key responsibilities include:

- Reviewing all documentation and correspondence related to the complaint.
- Engaging with the complainant to understand unresolved concerns.
- Providing a final internal decision with clear reasoning and outcomes.
- Identifying any governance, policy, or procedural issues.
- Ensuring that Stage Two responses meet quality and timeliness standards.
- Reporting findings to the Complaints Officer and relevant leadership teams.
- Supporting organisational learning and improvement through case reviews.

9.5 The Monitoring Officer plays a critical governance role in the complaints process, ensuring legal compliance and ethical standards. Their involvement is essential in cases involving potential maladministration, member conduct, or governance concerns. It will be the investigating officer, in the first instance, who will raise these issues with the monitoring officer.

Key responsibilities include:

- Reviewing complaints that raise legal, ethical, or governance issues.
- Advising on complaints involving elected members or breaches of the Code of Conduct.
- Liaising with relevant stakeholders on member-related complaints.
- Ensuring that complaints with corporate governance implications are escalated appropriately.

9.6 When the Local Government and Social Care Ombudsman find fault in any upheld complaint, the Council's Monitoring Officer will report this to elected Members in accordance with the statutory duty under Section 5/5A of the Local Government and Housing Act 1989. This duty may be discharged through the annual reporting process, or through a case-specific report where the Ombudsman's findings have wider implications.

9.7 All staff have a role in supporting a positive complaints culture. They are expected to engage constructively with feedback and contribute to service improvement. Key responsibilities include:

- Responding to complaints professionally and empathetically.
- Understanding the difference between service requests and complaints.
- Referring formal complaints to the Customer and Communities Complaints team.
- Participating in training and development on complaint handling.
- Supporting the resolution of concerns and complaints at the earliest opportunity.
- Contributing to learning and improvement through feedback and reflection.
- Promoting transparency and accountability in service delivery.

10. Unacceptable Behaviour

10.1 The Council recognises that some complaints may be persistent or abusive in nature. To manage such cases, the Council may apply its Unreasonable Behaviour Policy. This may include:

- Limiting contact to specific channels or times.
- Refusing to investigate repetitive complaints without new evidence.
- Escalating concerns to legal or safeguarding teams if necessary.
- Any decision to apply restrictions will be approved by a senior officer and communicated clearly to the complainant.

11. Complaints Learning and Improvement Group

11.1 The Council will establish a Corporate Complaints Group comprising representatives from each service area. This group will:

- Share best practices and ensure consistency in complaint handling.
- Review complex or cross-cutting complaints.
- Promote organisational learning and service improvement.
- Support the Head of Service - Customers and Communities in policy review and training initiatives.

12. Engagement

12.1 Exeter City Council is committed to engaging with residents, service users, and complainants in all aspects of complaints management. This includes gathering feedback on the complaints process, outcomes, and service delivery to ensure continuous improvement. The Council will actively engage with stakeholders to inform policy updates, improve transparency, and enhance the overall effectiveness of complaint handling. Engagement activities may include surveys, focus groups, and direct outreach to ensure that the voices of service users are heard and reflected in service improvements.

13. Publication of Self-Assessment Outcomes

13.1 The Council will publish the results of its annual self-assessment against the LGSCO and Housing Ombudsman Codes. This will include:

- Areas of compliance and improvement.
- Actions taken to address gaps.
- Performance trends and learning outcomes.

The published reports will be available via the Council's website.