



Internal Audit Report 2018/19

Comments, Compliments and Complaints

January 2019

Contents

1. Executive summary	2
2. Background and Scope	4
3. Detailed findings and action plan	5
Appendix 1. Definitions and classification	8
Appendix 2. Terms of reference	9

Distribution List

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This report has been prepared only for Aylesbury Vale District Council in accordance with the agreed terms of reference. The findings should not be relied upon by any other organisation.

1. Executive summary

Report classification*	Total number of findings				
	Critical	High	Medium	Low	
	Control design	-	-	1	-
Low Risk (4 points)	Operating effectiveness	-	-	-	1
	Total	-	-	1	1

*We only report by exception, which means that we only raise a finding / recommendation when we identify a potential weakness in the design or operating effectiveness of control that could put the objectives of the service at risk. The definition of finding ratings is set out in Appendix 1.

Summary of findings

This report is classified as Low risk. We identified one medium and one low risk finding.

During the period under review being 1 April to 20 November 2018 the total number of complaints, comments and compliments were c. 620 (c. 510 complaints, c. 50 comments, c. 60 compliments). The most significant finding from this review is that the customer did not always receive an outcome to the complaint within the 15 working days target. Where the target was breached there was limited/no evidence to support that the customer had been contacted to notify them of the delay. Our sample testing also identified that where a complaint is escalated to stage 2, there was no prompt notification back to the complainant to state this, as per the policy. Lack of or late responses can further affect the relationship with the customer who is already dissatisfied with a service or outcome.

The audit also concludes that improvement should be made to standardising who receives the initial training regarding the handling of comments, compliments and complaints. The Local Authority Ombudsman document from March 2009 “Guidance on running a complaints system” was issued some time ago but the context and good practice stated can still be regarded as current. It states that “all council staff should be aware of the complaints process and how to access it” and “front line staff have a crucial role, not only in ensuring access to the complaints procedures but in capturing information about things that may be going wrong”.

Summary of findings

- There were delays in responding to 7 out of 19 stage 1 complaints with a further delay where the complaint was escalated to stage 2 (Finding 1 – Medium)
- All new starters across the Council are provided access to the e-learning but it is not a mandatory requirement for any staff member, including front line staff, to complete the e-learning. Currently, there are no targets set out for the e-learning compliance. (Finding 2 – Low)

Good practice noted

- The complaints policy was reviewed in October 2018 which is broadly in line with the Local Government Ombudsman good practice guidance
- There is clear reporting of complaints referred to the Local Authority Ombudsman in service areas

such as planning, revenues and benefits, to the Council's Appeals and Complaints Committee

- Automatic acknowledgement letters go out for comments and compliments which ensures everyone is responded to immediately for these
- Reporting includes summarising transaction data onto a dashboard which covers a number of indicators to assess activity particularly around complaints. This includes trends of complaints month on month and measuring timeliness by percentages to ensure high levels of compliance are reached. This is reported to a wide audience which includes the Leader of the Council and discussion around trends are undertaken
- Upgrading of the comments, compliments and complaints case management system is taking place in early 2019 to allow enhanced system functions.

Management comments

We will continuously look at ways to improve the response times to customers and, following the audit, we have put in place extra procedures to ensure response timelines are met.

Overall there is a good range of controls in place for CCCP since it was handed over to Customer Relationship. We have tightened the controls, monitoring and reporting of the process and these measures are more robust and lead to greater accountability.

2. Background and Scope

Background

In AVDC's Customer Charter, the Council has promised to provide its customers with a great service and be open, trustworthy, innovative and efficient. AVDC has recently updated its comments, compliments and complaints process (CCCP) and policy to ensure that it is in line with its Customer Charter and to simplify the process for the customer, reflecting the digital approach to contact. Customers can raise compliments, comments and complaints via the following routes:

- Online form
- Call the Customer Relationship Team
- Written form/post.

The customer can provide AVDC with the following information:

- Comments - suggestions for how AVDC could improve
- Compliments - feedback on what AVDC has done well
- Complaints - dissatisfaction with the quality of a service provided by AVDC
- Councillor Conduct - to make a complaint about the conduct of an AVDC Councillor.

The coordination of the CCCP was recently moved to the Customer Relationship Team. They are supported by service liaison officers (SLOs) who manage and allocate complaints. iCasework is used to process and report complaints. The system is being upgraded, with the new version planned to go live in January 2019.

When a complaint is received, SLOs will review it and contact the complainant by phone within 48 hours. If the complaint cannot be resolved by the SLO during the call, it will be escalated to follow the stage one process. There should be a formal acknowledgment of a complaint within 5 working days of the call. The complaint will also be assigned to the relevant officer and the manager should respond within a further 10 working days. If the customer is satisfied, the complaint will be closed

If the complaint is not resolved satisfactorily by the response of the manager and the customer has notified AVDC of the dissatisfaction, the complaint will be escalated to follow the stage two process. An acknowledgment should be sent to the customer within 5 working days and the complaint will be assigned to the relevant manager, head of service or director. The complaint should be investigated and responded to within a further 10 working days. If the customer remains unsatisfied with AVDC's response at the end of the stage two process, the customer can ask the Local Government Ombudsman to look into the complaint.

Scope

The scope covered the key risks set out in the Terms of Reference (Appendix 2). Our testing included:

- Review of a sample of 25 comments, compliments and complaints from the period 1 April to 20 November 2018 to check whether procedures were followed as per the Comments, Compliments and Complaints Policy 2018 (3 comments, 3 compliments and 19 complaints).
- Review of the outcome of comments, compliments and complaints to ascertain lessons learnt.
- Review of the training given to staff in dealing with comments, compliments and complaints received.

This does not represent a comprehensive list of tests conducted.

3. Detailed findings and action plan

1. Instances of non-compliance with Complaints Policy particularly around evidencing response to complainants – Operating effectiveness

Finding

The Council uses a system called iCasework to manage and record comments, compliments and complaints. In order to test compliance with the policy, we received a list of all comments, compliments and complaints from 1 April 2018 until 20 November 2018. A sample of 25 was selected covering 3 comments, 3 compliments and 19 complaints. In addition, we reviewed iCasework to determine the evidence that is retained during the process.

Complaints

- In seven cases, the responsible service manager did not respond to the complaint within 15 working days from the original date that the complaint was received for stage 1, and in three cases for stage 2 complaints the complainant was not responded to within a further 15 working days. It should be noted that a new procedure has been put in place in January 2019 in light of this finding. The new process means that at day 12 a chaser email will be sent to the service manager and if no response received at day 13, the service liaison officer will notify and escalate to Group Manager Customer Relationship who will insist of a response from service manager in order to meet timeline
- In five cases, an extension email or a letter was not sent to the complainant where the investigation timescales breached the reporting timescales as per the policy. Per above, the Council have put in place a new procedure which should resolve this moving forward
- In another case, the acknowledgement letter was not sent within five working days of the stage 2 escalation request date.

Comments

- In one case, the responsible service manager did not respond to the comment for over 40 working days. A review of the case on iCasework identified that this was a service request and should have been rejected as per the complaints policy
- In another case, the responsible service manager responded within 15 working days of the comment being received by the Service Liaison Officer, however the manager concluded that the comment was not related to their service area and the case was immediately closed. There was no evidence to suggest that the resident had been contacted for more information. In this case the classification was incorrectly recorded therefore the service manage was not aware they needed to respond.

Other

Furthermore, the complaints policy does not identify a date for next review.

Risks / Implications

If complaints are not addressed as per the policy timeframes, there is a risk that this will further increase customer dissatisfaction and cause damage to customer relationships. Dissatisfied customers may escalate issues to the Local Government Ombudsman.

Finding rating	Action Plan	
Medium	a) Monitoring of the status of a comment, compliment or a complaint should be undertaken using iCasework by the Service Liaison Officer as per the policy with the relevant investigating manager being contacted for progress. Evidence will be obtained and added to ensure a case is not closed prematurely.	<i>Responsible person/title</i>
		<i>a - d) Hazel Hutt, Group Manager</i>
	b) Reminders will now be diarised c) Where there are delays in the concluding of an investigation the customer should be contacted to make them aware of the delay d) The Council should record a next review date for the relevant policies and include the document change history for policies.	<i>Target date</i>
	<i>a – d) April 2019</i>	

2. Training compliance is low and no specific targets are set – Control effectiveness

Finding

For training on the handling of comments, compliments and complaints, there is an e-learning module available for staff. This e-learning was last updated on 22 October 2018. All new starters across the Council are provided access to the e-learning but it is not a mandatory requirement for any staff member to complete the e-learning.

The compliance rate for e-learning was 53% for all staff and 80% for all staff excluding the depot. Currently, there are no targets set for the e-learning compliance. It was confirmed by Group Manager (Customer Relationship) that compliance of e-learning is for Human Resources to action and Customer Relationship does not have a control over it.

Risks / Implications

If front line staff are not required to complete training to identify and address comments, compliments or complaints there is a risk that they are inappropriately managed and result in customer dissatisfaction.

Finding rating

Action Plan

Low

a) The complaints E-learning should be made mandatory for frontline staff who have regular contact with customers. All staff who join should complete training as part of their induction.

b) An e-learning compliance rate should be set and monitored and reported regularly by service area.

Responsible person / title

a) Robert Bowman, HR

b) Hazel Hutt, Group Manager

Target date

a) June 2019

b) March 2019

Appendix 1. Finding ratings and basis of classification

Report classifications

The overall report classification is determined by allocating points to each of the individual findings included in the report.

Overall report classification		Points
●	Critical risk	40 points and over
●	High risk	16– 39 points
●	Medium risk	7– 15 points
●	Low risk	6 points or less

Finding rating	Points
Critical	40 points per finding
High	10 points per finding
Medium	3 points per finding
Low	1 point per finding

Individual finding ratings

Finding rating	Assessment rationale
Critical	<p>A finding that could have a:</p> <ul style="list-style-type: none"> • Critical impact on operational performance; or • Critical monetary or financial statement impact [quantify if possible = materiality]; or • Critical breach in laws and regulations that could result in material fines or consequences; or • Critical impact on the reputation or brand of the organisation which could threaten its future viability.
High	<p>A finding that could have a:</p> <ul style="list-style-type: none"> • Significant impact on operational performance; or • Significant monetary or financial statement impact [quantify if possible]; or • Significant breach in laws and regulations resulting in significant fines and consequences; or • Significant impact on the reputation or brand of the organisation.
Medium	<p>A finding that could have a:</p> <ul style="list-style-type: none"> • Moderate impact on operational performance; or • Moderate monetary or financial statement impact [quantify if possible]; or • Moderate breach in laws and regulations resulting in fines and consequences; or • Moderate impact on the reputation or brand of the organisation.
Low	<p>A finding that could have a:</p> <ul style="list-style-type: none"> • Minor impact on the organisation's operational performance; or • Minor monetary or financial statement impact [quantify if possible]; or • Minor breach in laws and regulations with limited consequences; or • Minor impact on the reputation of the organisation.
Advisory	<p>A finding that does not have a risk impact but has been raised to highlight areas of inefficiencies or good practice.</p>

Appendix 2. Terms of reference

The key risks agreed in the Terms of Reference are set out below.

Sub-process	Risks	Objectives
Policy and procedure	The Policy and procedure is not reflective of the Council's working practice Non-compliance with LGO requirements	<ul style="list-style-type: none"> The Policy has been approved by management and Members at appropriate intervals The policy & procedures can be readily accessible by staff and customer
Roles and Responsibilities	Roles and responsibilities across the Council are not clearly assigned	<ul style="list-style-type: none"> A structure for management and coordination of CCCP is in place with clearly defined roles and responsibilities
Comments, Compliments and Complaints	Damage to customer relationship Unable to use the information to improve systems, processes and practice Potential fines and reputational damage	<ul style="list-style-type: none"> Complaints are appropriately identified/recognised. Documented process in place and followed for management of comments, compliments and complaints Lesson learnt from comments, compliments and complaints are shared across the service/Council Corrective action is taken where necessary to address the underlying causes of complaints Evidence of comments, compliments and complaints are retained in accordance with policies
Training	Staff have not received appropriate training in relation to the management of comment, compliments and complaints	<ul style="list-style-type: none"> Training to new starters is in place Compliance for training is monitored to ensure expected levels are met On-going training for relevant personnel is identified and given
Monitoring & Reporting	Poor oversight from management. Inability to learn from lessons and ensure corrective action has been carried out. Lack of ability to manage performance	<ul style="list-style-type: none"> There is agreed and regular reporting that identifies trends and meets expected compliance/performance indicators which have been set CCC are shared appropriately with those concerned. CCP information is used to assess performance against the customer charter.