



## **Scrutiny Exercise 6 – WDC Complaints Handling**

### **Introduction**

This is our 6th Scrutiny Exercise and all meetings were held via zoom due to the COVID pandemic. The Panel started this exercise on 09/11/20 and discussed the Charter performance report for 2019/20. Complaints handling was identified as an area of interest for the Panel as performance was poor, not improving and in the bottom quartile compared to other landlords. It was also felt that as performance was in relation to a process it should be less impacted by COVID than many other areas.

### **Methodology**

The scoping exercise included reviewing a breakdown of the number of complaints and what categories they come under to identify if there were any patterns or keys areas of complaints. (COM REF 2). The Council's complaints procedure, process map and web information was reviewed. Specific information requests were made and provided by the Citizen Services team. As only 48% of complaints were closed within the target timescale, we wanted to assess more details on the timeline of specific complaints and examined 10 examples of complaints which were completed out-with the target.

On 19/05/21 Lorraine Payne from Citizen Services attended our meeting and answered questions that the Panel had sent her in advance which helped our understanding of the process.

### **The WDC process and issues identified**

The website introduction paragraph notes about using complaints to improve services which is also reflected in the MCHP but this stage is not mentioned in WDC's procedure or process map. We also reviewed Performance & Monitoring Review meeting notes (COM Ref 11). The focus is on service areas to action improvements and learn from complaints. On the feedback from Nicola Docherty re Reports to Performance & Monitoring Review meeting (COM REF 12 and 13) we noted that there was no corporate collation of complaints or anything learned from them – the assumption is that service area managers take appropriate action.

We saw some evidence of learning from complaints and things being changed when we looked at some individual responses to complaints and specifically from one that had been to the SPSO. However the current process seems to be quite fragmented and this should be reviewed. A key area that could be improved is by ensuring that reporting back on actions/improvements are seen as part of the complaint handling process and bring

together the work of the citizen services and service areas. To improve learning from complaints, service areas need to want to learn from complaints and be able to evidence learning. We asked Service managers for their understanding of how learning from the complaints is undertaken, reported and leads to service improvements and got very varied responses (COM REF 24). Building services seemed to have a clearer process for learning from complaints but would want that to be consistent across service areas and having it included in the process map would help achieve that.

System issues were identified as an issue and Camino and Caboodle had limitations for monitoring effectively which is a major shortfall. The use of a specially created spreadsheet now at least gives staff the ability to monitor the process as they need to and be able to report performance. Other landlords that we received information from had systems that automatically sent reminders to staff a couple of days ahead of the deadline e.g. Renfrewshire Council use Firmstep- DASH. Such system alerts could help speed up the process and free staff time up to focus on the complaint investigation and response.

Having an effective system will help but staff still need to prioritize responding to complaints for response times to be reduced. From the examples of complaints timelines (COM REF 9) it was noted that the main delay is 'information not received from service area'. Despite being given deadlines for responses the majority are not met. At the moment there are no categories set up to monitor the reasons for delays. To help understand and then reduce delays, service areas should record reasons for delays e.g. staff resources, complex complaint etc. Service areas should also prioritize complaints in same way as they do Freedom of Information requests– they are statutory and so staff adhere to that timescale so complaints need to be seen in the same way.

Lorraine Payne confirmed that the system improvements they were already looking at were that they have stopped using Camino until improvements can be carried out. The spreadsheet currently in place works and can record all necessary data but a better system with automatic alerts and reminders might help staff focus and meet the target timescales and is something that should be properly assessed. The option of doing a pilot using housing's QL system should be investigated and an assessment of systems used by other landlords could be undertaken.

We also reviewed the recent Ombudsman complaint about WDC's complaint handling process (COM REF 23). The Ombudsman had been critical of how WDC handled the complaint as the complainer had spoken to number of different officers but not logged as a complaint or recognized early enough as a complaint. This example flags that staff need to be more able to recognize complaints and respond appropriately. When looking at Falkirk Council's complaint handling they had good staff guidance which WDC staff could benefit from and would highlight staff focus on complaints and the need to log and learn from them.

The Ombudsman case also highlights that satisfaction surveys could be used to capture issues where people are not satisfied with the process irrespective of what they complaining about and help identify when the complaints process is not working effectively as the customer did not feel their complaint was dealt with. Lorraine Payne has confirmed that she is looking at a satisfaction survey and still to agree standard questions with group of other landlords. The Panel's recommendation would be that satisfaction surveys are introduced to ensure that this happens.

## **What works**

From the examples of letters to customers about their complaints being upheld and those that are not upheld (COM REF 8 a, b, c and d) we agreed that the letters were clear and reasonable responses. We discussed the use of the upheld / not upheld format which we did not think was good phrasing but the letter examples we saw avoided using such terms and we were pleased to see that 'resolved' was adopted as an option in the new MCHP.

The fact that whether a complaint is upheld or not is decided by the Citizen Services team we think is good and can see the benefits of someone more independent from the service area making that decision.

The Panel were satisfied that some complaints made via social media do get identified as complaints and get recorded (3 in 2019). Appreciate that difficult to distinguish between complaints and 'rants' and acknowledge that Lorraine Payne's team do monitor and ensure legitimate complaints can get picked up from social media.

Despite a slight delay in implementation, we were reassured by Lorraine Payne that WDC will have the fully implement the MCHP by June 2021. The MCHP states that all complaints should be recorded including anonymous complaints and we think this is an important aspect of ensuring all incidences of dissatisfaction are recorded and learnt from and staff need to be encouraged to log complaints on tenants behalf and anonymously if requested. Staff guidance needs also to be updated to take account of the MCHP.

## **Benchmarking and Good Practice From Other Similar Local Authorities**

Information on other better performing landlords was collected and compared to WDC's. We looked at the processes followed by Renfrewshire, Fife and Falkirk Councils and they all followed similar processes to WDC, had central teams handling complaints, sent reminders and followed the MCHP. These Councils were able to meet the target timescales more consistently and particularly in the last year and despite the restrictions of home working, were still able to only have a minimal slip in performance compared to WDC who dropped by 23% for responding to Stage 1 complaints and ranked bottom (COM REF 18b).

This showed that other similarly sized landlords, following similar processes were still able to respond to complaints more quickly than WDC. With delays being identified as being due to slow service areas responses this infers that other Councils are able to motivate staff to prioritize complaints more which reinforces our recommendation that WDC needs to prioritize complaints.

Falkirk Council also had good information for staff handling complaints, e.g. a "do's and don'ts" document that emphasized being sensitive and responding with 'courtesy, tact and empathy' which could help reinforce to WDC staff a good approach to complaint handling.

## **Summary**

Compared to other landlords following the MCHP procedure, WDC's complaints handling is not working effectively and the process is fragmented between what the Citizen services team does and the service areas. To meet the timescales there needs to be more priority attached to complaints by all staff.

The Scrutiny Panel note that there is a current action to carry out self-assessment of complaints handling process using SPSO Complaints Process Quality Assurance Tool. Lorraine Payne advised that this is planned for this year and the Panel hope that this will identify further areas for improvement.

There are 2 key areas for improvement that our recommendations all relate to,

### **A. Improving timescales for responding to complaints**

#### **Recommendations:**

1. Service areas need to prioritise responding to complaints within target timescales and provide this clear commitment
2. To help understand and then reduce delays, service areas should record reasons for delays when targets are not met e.g. staff resources, complex complaint etc. These reasons should be recorded and reported on
3. Introduce satisfaction surveys for all closed complaints and review feedback quarterly
4. Report to the Scrutiny Panel progress made in carrying out the assessment of the complaints handling process using SPSO Complaints Process Quality Assurance Tool, including any actions that are identified
5. Provide the Scrutiny Panel with regular performance reports outlining complaints response times.

### **B. Improve learning from complaints**

To improve learning from complaints, service areas need to be able to evidence learning. The Assumption is that Managers are taking appropriate actions but the process seems quite fragmented.

#### **Recommendations:**

6. review and update the process map to include learning from complaints so it is clearer where this responsibility lies
7. Put a process in place so that learning can be reported to tenants and demonstrate that tenants are being listened to and improvements made
8. Update staff guidance on complaints handling to reflect the new MCHP and emphasize the importance of recognizing complaints, recording even anonymous complaints and learning from complaints.

If our recommendations are approved, the Scrutiny Panel would like to be provided with evidence that they are implemented as has previously been agreed. We would assume that these recommendations can be completed before the end of March 2022 and would like that confirmed as part of this report being agreed.

### **Thanks and appreciation**

The Scrutiny Panel are grateful for the co-operation of Lorraine Payne, the Citizen Services team and Service area Managers in providing information and assistance in completing this scrutiny exercise which had to be done remotely.

The Scrutiny Panel members involved in this digital project were; Rita Howard, Fiona McClymont and Alex McMillan.

The Panel were supported by Jane Mack, Hanne Thijs (Tenant Participation) and Stefan Kristmanns (Housing Development Co-ordinator).

### **Referenced documents**

**COM REF 1** - Charter Outcome 2 – Communication - self-assessment of 2019/20 performance  
**COM REF 2** - Complaints database – 2019-20  
**COM REF 3** - WDC Complaints procedure  
**COM REF 4** - Using the Complaints Procedure (website info)  
**COM REF 5** - How to complain (website info)  
**COM REF 6** - Customer complaint process  
**COM REF 7** - Email response from Lorraine Payne (2/2/21) to Scrutiny Panel questions  
**COM REF 8 a, b, c and d** –example letter responses to complaints  
**COM REF 9** - TimeLine examples of Stage 1 and 2 complaints  
**COM REF 10** - SPSO Complaints Process Quality Assurance Tool  
**COM REF 11** - Email response from Lorraine Payne 3/3/21 to follow up questions  
**COM REF 12** - Performance and Monitoring Review Meeting Q3 report  
**COM REF 13** - Performance and Monitoring Review Meeting Q4 report  
**COM REF 14** - SPSO – The Local Authority Complaints Handling Procedure  
**COM REF 15** - 28/4/21 Phone conversation with Nicola Docherty, Performance & Strategy Business partner for Housing & Employability in response to Panel query  
**COM REF 16** - Summary of Local Authority Model Complaints Handling Procedure (MCHP)  
**COM REF 17**- Complaints benchmarking information  
**COM REF 18** – Performance data from SHR website  
**COM REF 18b** - 2020/21 benchmarking data Complaints Handling  
**COM REF 19** – Extract from current complaints database  
**COM REF 20** - Falkirk Council – extracts from their staff guidance on complaints handling.  
**COM REF 21**- Fife Council's complaints process

**COM REF 22** - Renfrewshire Council's complaints process

**COM REF 23** – SPSO Decision report on WDC May 2021

**COM REF 24** – WDC Service Managers' understanding around how learning from the complaints received is undertaken and reported

