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**GOVERNANCE & AUDIT COMMITTEE: 24 OCTOBER 2023**

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**COUNCIL COMPLAINTS – ANNUAL REPORT**

**REPORT OF THE CHIEF DIGITAL OFFICER**

**AGENDA ITEM: 8.1**

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**Reason for this Report**

1. This report has been produced to enable the Governance and Audit Committee to review and assess the authority's ability to handle complaints effectively, and make any associated reports and recommendations.
2. The Governance and Audit Committee has incorporated the above responsibility into its terms of reference, as required in accordance with the provisions of the Local Government and Elections (Wales) Act 2021.

**Background - Halo**

3. Members will be aware from previous committee meetings that the Authority has committed to the introduction of a single, corporately owned system for Complaints, Cabinet Member Enquiries & Member Enquiries (Halo). The aim of the council-wide system is to improve the handling process, increase efficiency and provide corporate oversight of the complaints and member / cabinet enquiries across the organisation.
4. On 19 July 2022, Members received a presentation on corporate complaints handling arrangements and the work that had taken place regarding the new system. We believe the Committee were comforted with the work that had been carried out and we received positive feedback from the Committee regarding the work that had taken place in choosing the system. Members noted that this project had received the go-ahead from the highest level and that there will be an approval process for responses by Operational and Senior Managers to improve the consistency and quality of response. All were in agreement that complaints and compliments can provide a wealth of information that would benefit us an organisation and that the implementation of Halo was a positive move for the Council. Future reporting will place more importance on what we as an Authority are learning from complaints, to support improvement in complaint handling and in service delivery. This information will be regularly collated and analysed so that decision makers can regularly review the information gathered from complaints when planning service delivery.
5. On 29 November 2022, Members received a further presentation and the committee remained very positive, although it was reported that the project timeline had slipped due to configuration and resource issues, all of which were discussed at the November meeting. Though this slippage did present problems, it enabled the project board to carry our further engagement with our stakeholders and during this phase (Phase 1), we were able to carry

out several improvements to the potential system as a result of this engagement, including improved workflow, categorisation and routing.

6. As a summary for Committee, Phase 1 (configuration and testing phase) involved intensive testing of the system with any identified bugs and issues raised with HALO for fixes. During this time, a Project Manager was appointed in addition to a dedicated ICT Halo Support Engineer. Comprehensive meetings were undertaken with shareholders to discuss dashboards and reporting requirements. In addition to ongoing fixes for bugs and issues discovered through testing, further configuration and development work has taken place including HTML templates, emails, notifications, and attachment views. A Cabinet and Members 'test' instance was created and trialled (soft launch) in April 2023 ahead of full launch in August 2023. All testing of instances were completed over a series of days at County Hall, with ICT present to resolve issues and make configuration changes as needed. The Training resource for the Cabinet / Members instance was finalised and added to the SharePoint landing area. Finally, communications were created ahead of being sent across the organisation to make staff aware of the introduction of a new system.
7. Following this, the launch of Cabinet and Member Enquiries (Phase 2 of the project) took place in August and has been very well received with no significant issues reported.
8. As a summary for Committee of Phase 2, the new (OM and above) approval process is in use and working. Cabinet and Member Enquiry teams having visibility of tickets across the service area's during the ticket lifecycle has been described as a real benefit, in addition to the ability to view the ticket history. Training was rolled out ahead of the project launch – face-to-face and via video – and has been well received. Further meetings have taken place with HALO to discuss building bespoke reports and dashboards now there are live tickets in the system for Members / Cabinet / Directors and SA's. This is in addition to the comprehensive report function where pre-built reports already exist. Finally, as part of Phase 2, work began on building the Complaints and Compliments test instance, though work was a continuation from that which had already taken place with creation of Cabinet and Member Enquiries instance.
9. Phase 3 (Complaints and Compliments) is scheduled for launch at the end of January 2024. We are able to use what we have learnt during Phases 1 and 2 to refine the system and, in preparation for this date, face-to-face training has been made available for service areas to get used to the new system and new processes. We have also developed a comprehensive user guide and accompanying video which will assist with some of the common issues and questions our colleagues may have.
10. A dedicated sharepoint page has been created and which has links to training options. Over the last eighteen months, we have developed comprehensive training packages (some in conjunction with the Ombudsman) and these are available for our staff that will handle complaints. These training resources will encourage quality and consistency in our complaint responses.
11. Regular project updates have taken place with Operational Managers and Senior Managers (who will be approving responses within the new system). This is to remind them of their responsibilities and to encourage the "buy-in" necessary for this project to succeed.
12. During our previous visits, we have presented to members that it is our contention that we do currently deal with complaints effectively. However, it remains our position that the implementation of the council-wide system will drive efficiencies and improvements via a standardisation of approach and greater monitoring capabilities, particularly when it comes to recording and reporting on complaints.

## Internal audit

13. In June 2023, as part of the Council's Internal Audit Plan, a review was completed on the Council's Complaints and Compliments arrangements across the Council. The objectives of the audit mirrored the areas that the Governance & Audit Committee require assurance on, and included; to review and assess the authority's ability to oversee compliments and complaints effectively and efficiently, ensure policies and procedures are in place and accurate records are maintained and that the procedures are supported by guidance and training for all staff involved in the compliments and complaints process.
14. Background audit information was gathered from a thorough review of the policies and procedures in place for compliments and complaints handling. Regard was given specifically to the working practices and processes of service areas under each individual system. Sampling was used to identify and ensure accurate records were maintained and accessible and that complaints were consistently logged and tracked within set time parameters in accordance with the specific legislation and policies governing the complaints handling processes.
15. Management meetings took place between Internal Audit and the relevant service areas to ensure each system audited had a distinct focus. Meetings also took place with relevant senior managers across the Council and head teachers at schools to discuss their process of complaints handling and the range of management reporting.
16. Audit also engaged with a wider number of senior officers from across the Council who deal with complaints directly and/or indirectly as part of their job role during the review
17. Within their findings, the auditor was able to provide an assurance level of **Effective with opportunity for improvement** and there were five recommendations that were raised in the audit, the first four relating to our Corporate team with the fifth related to Education- Governor Services. The recommendations included:
  - Re-establishment of Corporate Complaints office meetings on a quarterly basis, to be chaired by the corporate team and where officers can learn from the complaints 'group' and receive peer support.
  - Update of Standard Operating Procedure (SOP) particularly around definition of a complaint – and to discuss with complaints group – to support consistent application of the policy across the Council.
  - For all efforts to be made to get the HALO system implemented within set timescales.
  - Following the roll-out of HALO, a quality assurance system to be developed centrally on compliance and the efficiency and effectiveness of complaints handling.

For a briefing note to be provided to schools and their Governing Bodies at the end of each financial year, together with a termly checklist to remind them of key responsibilities, We are happy to confirm that recommendations 1 and 2 are complete and we are making steady progress with recommendations 3 and 4 (as detailed in this report). Recommendation 5 has been accepted by Governor Services for delivery in March 2024. We understand the Chair of the Governance and Audit Committee has reviewed the recent audit and is comforted by the report.

## Complaints Handling

18. The Authority has separate teams to deal with our Adult Services, Children's Services and Corporate Complaints respectively, whilst each school Governing Body will have its own arrangements for complaints handling in their respective school. During the last twelve months, the Committee has received assurance and high-level details of complaints handling arrangements in each of the above arrangements.
19. The Committee's terms of reference include the responsibility to "review and assess the authority's ability to handle complaints effectively", for which further details are provided in the following paragraphs.
20. In terms of current assurances, the Authority can take assurance from the consideration of the Ombudsman that the Council's complaints handling policy is deemed to be compliant with the Ombudsman principles and model complaints handling policy.
21. The Corporate Complaints Team continue to provide advice and support to complaints contacts across the council on a weekly basis. As recommended by the Internal Audit, the team also facilitates a quarterly meeting of the complaints contacts to discuss any key issues, share good practice and to capture any lessons that can be learned to inform service improvement.
22. Complaints Officers in each Directorate have access to appropriate training and the Authority has developed a bespoke training package (in conjunction with the Ombudsman) which is available to all council officers. The Corporate Complaints Team make the recommendation that complaints-specific training will be compulsory for all officers who handle complaints and these officers will receive training by the end of the calendar year.
23. During 2022/23, a Standard Operating Procedures has been introduced to assist complaints officers in terms of how to handle complaints. This document has been developed to ensure an increased consistency of approach across the Authority and should result in greater efficiency.

## **Complaints and Compliments Report**

24. Our Annual Complaints and Compliments Report can be found at Appendix 1 and will shortly be presented at the October 13<sup>th</sup> Cabinet meeting. Members of the Committee will note that 3,071 complaints were recorded by Cardiff Council during 2022/23. This represents a 15.5% decrease compared to the previous financial year when 3,633 complaints were recorded.
25. Members can also find attached the Ombudsman Annual Letter 2022-23 at Appendix B. Data contained within this letter has been presented in the aforementioned Annual Complaints and Compliments Report. The Ombudsman has specifically requested that her annual letter be presented "to the Governance & Audit Committee to assist members in their scrutiny of the Council's performance". Furthermore, the Ombudsman has asked if any feedback from the Governance & Audit Committee can be shared with her office.
26. The Ombudsman's Annual Letter presents valuable statistical data on how well we as an authority "handle complaints effectively". As mentioned, Cardiff Council recorded 3,071 complaints during 2022/23. However, just 143 complaints were made to the Ombudsman about Cardiff Council. Of these 143 complaints, 71 were closed after initial consideration, 30 were considered premature for the Ombudsman to consider and 19 were out of the Ombudsman's jurisdiction – leaving just 23 cases that needed Ombudsman intervention.

27. It is envisaged that, once the council-wide system is in place, future Complaints and Compliments Reports will place more importance on what we as an Authority are learning from complaints, to support improvement in complaint handling and in service delivery. This information will be regularly collated and analysed so that decision makers can regularly review the information gathered from complaints when planning service delivery.
28. Members are reminded that there are separate processes for dealing with complaints about Social Services and that Social Services have their own procedure and teams for managing complaints. The Social Services Annual Complaint Report will be reported to Cabinet on 21 September.

### **Legal Implications**

29. Under Part 6 of the Local Government and Elections (Wales) Act 2021, section 115, Governance and Audit Committees are given new statutory functions, with effect from 1st April 2021, to 'review and assess the authority's ability to handle complaints effectively', and 'make reports and recommendations in relation to the authority's ability to handle complaints effectively'. The information set out in the report and appendices is provided for the Committee to review, assess and consider whether to make any reports and recommendations to the authority in this regard. In discharging its functions, the Committee must have regard to any relevant guidance issued by the Welsh Government.

### **Financial Implications**

30. The financial implications (if any) arising from this report have been contained within the body of the report.

### **RECOMMENDATIONS**

31. That the Governance and Audit Committee considers and notes the content of the report, in respect of its role to review and assess the authority's ability to handle complaints effectively, and to make any associated reports and recommendations.

**Isabelle Bignall**  
**Chief Digital Officer**

The following is attached:

- Appendix A:** Draft Annual Complaints and Compliments Report 2022/23
- Appendix B:** Ombudsman Annual Letter 2022/23
- Appendix C:** Presentation Slides