

CABINET
19 NOVEMBER 2025

PART 1 – PUBLIC DOCUMENT

TITLE OF REPORT: UPDATED 3C’S POLICY

REPORT OF: CUSTOMER & DIGITAL SERVICES MANAGER

EXECUTIVE MEMBER: CLLR VAL BRYANT

COUNCIL PRIORITY: ACCESSIBLE SERVICES

1. EXECUTIVE SUMMARY

1.1 The 3Cs Policy has been refreshed to comply with the LGO’s complaint handling code, first introduced in February 2024. The code sets out the standards for resolving complaints promptly and using feedback to improve services. Most changes formalise practices the Council was already following, making procedures clearer and easier to understand. The code has been issued as “advice and guidance” for all local Councils in England and therefore one part of the code (section 6.14) is not being adopted, as the Council prefers to understand why a customer wants to escalate a complaint. The updated policy will be published on the website, and staff briefed on the changes.

2. RECOMMENDATIONS

2.1. That the updates to the policy be approved.

3. REASONS FOR RECOMMENDATIONS

3.1 It is recommended that Cabinet approve the updated 3Cs Policy, to align with the Local Government Ombudsman’s complaint handling code. The revised policy formalises existing good practices, clarifies procedures for staff and customers, and ensures continued compliance with national standards. These updates will support a fair, transparent, and consistent approach to handling feedback and complaints, helping North Herts Council maintain high service standards and a positive complaint-handling culture.

4. ALTERNATIVE OPTIONS CONSIDERED

4.1 The LGO’s complaint handling code is issued under the Local Government and Social Care Ombudsman’s powers to provide “guidance about good administrative practice” to organisations under section 23 (12A) of the Local Government Act 1974.

4.2 The LGO expects local councils to carefully consider the Code when developing policies and procedures.

4.3 The LGO may make a finding of maladministration where local councils’ policies and procedures depart from the Code without sufficient explanation. They may also make a

finding of maladministration where a local council, without good reason, does not meet the standards in the Code when responding to an individual complaint.

- 4.4 Given the above, no other options have been considered as it is essential that the Council is compliant in dealing with complaints as effectively as possible.

5. CONSULTATION WITH RELEVANT MEMBERS AND EXTERNAL ORGANISATIONS

- 5.1. The Executive Member for Customer Experience, Cllr Val Bryant has been consulted on the changes.
- 5.2. Political Liaison Board considered the updates to the policy on 7th October 2025.
- 5.3. The report has also been circulated to the Overview and Scrutiny Committee.

6. FORWARD PLAN

- 6.1 This report does not contain a recommendation on a key Executive decision and has therefore not been referred to in the Forward Plan.

7. BACKGROUND

- 7.1 The Council has a well embedded policy and procedures for handling customer feedback; the 3C's Policy. We welcome feedback from our customers about our services so that we can continue to learn about how we can make improvements and what we do well.
- 7.2 The 3C's policy sets out clearly the definition of a comment, compliment, and complaint, as well as how to escalate a complaint either to stage 2 of the process or the LGO. Customers can give feedback in several ways and can do this directly to the Council or to the contractors who provide key services on our behalf.
- 7.3 The 3C's policy was updated and refreshed and was adopted by Cabinet in September 2022. The updated policy has ensured the Council and communities we serve know how to access help, and that a safe and compassionate system to deal with complaints is in place.
- 7.4 In February 2024, the LGO launched their 'complaint handling code'. The Complaint Handling Code ('the Code'), sets out a process for organisations that will allow them to respond to complaints effectively and fairly. The purpose of the Code is to enable organisations to resolve complaints raised by individuals promptly, and to use the data and learning from complaints to drive service improvements. It will also help to create a positive complaint handling culture amongst staff and individuals.
- 7.5 As the policy was due for review in September 2025, the 3C's policy has now been updated to be compliant with the code, alongside internal supporting documentation ('3C's Manager's Guide & Procedures'), ahead of the deadline of April 2026.

8. RELEVANT CONSIDERATIONS

- 8.1 To date, there have been no issues identified with our complaints policy. The LGO have appeared satisfied with how we manage and resolve complaints, which demonstrates the effectiveness of our current processes.
- 8.2 To ensure compliance with the code, the policy and procedures have been updated. Appendix B outlines all the additions.
- 8.3 Some of the new additions to the policy are things the Council have already been doing in practice and are now documented within the policy. By making these actions formal, it's now much clearer for staff and everyone using our services and keeps things consistent with the code.
- 8.4 The updates do not fundamentally change our approach. By officially documenting these procedures and aligning with the new code, we've made it easier for both staff and customers to understand how everything works. Our process for handling feedback and complaints remains the same; the main difference is around the explanations which are clearer and more consistent.
- 8.5 There is one part of the code that will not be adopted by the Council, as seen in Appendix B. Section 6.14 of the code states that "Individuals do not have to explain their reasons for wanting to escalate a complaint to stage 2 of the process, simply that they remain unhappy". The Council does not take this approach, as we want to understand the specific reason for an escalation and ensure that we are making the best use of our resources by only considering stage 2 complaints under specific circumstances as set out below. Complainants are provided with three options to choose from, introduced many years ago:
1. The complaint has not been fully understood or investigated thoroughly due to a misunderstanding of the original complaint.
 2. That all points raised in the complaint have not been fully responded to.
 3. You have not had a response to the Stage 1 complaint within the prescribed timescales and have not had an indication as to when a response can be expected.

These 3 options are sufficiently broad enough to not prejudice the complainant. Once the criteria has been selected by the customer, this then provides a basis for Customer Services to begin their review of the stage 1, to see if it should be escalated to a stage 2 complaint.

9. LEGAL IMPLICATIONS

- 9.1 The Council has a statutory duty to comply with the LGO's guidance and ensure its complaints handling processes are fit for purpose. Adoption of the revised policy will mitigate risks associated with non-compliance. Following the most recent changes, the Housing Ombudsman and Local Government and Social Care Ombudsman have introduced a new Joint Complaint Handling Code for local authorities to use as the basis for their complaints policy. This report seeks to present a revised Complaints Policy for the Council that reflects the new Joint Complaint Handling Code.

9.2 This is an Executive function as set out in Cabinet's Terms of Reference include at 5.7.1 of the Constitution: 'to prepare and agree to implement policies and strategies other than those reserved to Council'.

9.3 There are no other legal implications arising from the report.

10. FINANCIAL IMPLICATIONS

10.1 There are no financial implications arising from this policy.

11. RISK IMPLICATIONS

11.1. Good Risk Management supports and enhances the decision-making process, increasing the likelihood of the Council meeting its objectives and enabling it to respond quickly and effectively to change. When taking decisions, risks and opportunities must be considered.

11.2 If we fail to review and update our policy we may be at risk of non-compliance with the LGO complaint handling code.

12. EQUALITIES IMPLICATIONS

12.1. In line with the Public Sector Equality Duty, public bodies must, in the exercise of their functions, give due regard to the need to eliminate discrimination, harassment, victimisation, to advance equality of opportunity and foster good relations between those who share a protected characteristic and those who do not.

12.2. There are no equalities implications arising from this policy.

13. SOCIAL VALUE IMPLICATIONS

13.1. The Social Value Act and "go local" requirements do not apply to this policy.

14. ENVIRONMENTAL IMPLICATIONS

14.1. There are no known Environmental impacts or requirements that apply to this policy.

15. HUMAN RESOURCE IMPLICATIONS

15.1 There will be no Human Resource implications arising from the policy changes.

16. APPENDICES

16.1 Appendix A – Updated 3C's policy

16.2 Appendix B – LGO codes that have been applied to the policy or procedures

16.3 Appendix C – LGO Complaint Handling Code

17. CONTACT OFFICERS

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18. BACKGROUND PAPERS

None.