

**CABINET
24 SEPTEMBER 2019**

PART 1 – PUBLIC DOCUMENT

**TITLE OF REPORT: REVIEW OF THE COMMENTS, COMPLIMENTS & COMPLAINTS
(3C'S) POLICY**

REPORT OF THE SERVICE DIRECTOR - CUSTOMERS

EXECUTIVE MEMBER: COUNCILLOR MARTIN STEARS-HANDSCOMB, LEADER OF THE
COUNCIL

COUNCIL PRIORITY: RESPONSIVE AND EFFICIENT

1. EXECUTIVE SUMMARY

- 1.1 This report seeks Cabinet approval to adopt the revised Comments, Compliments and Complaints policy (also known as 3Cs), attached as Appendix A to this report, in order to ensure the Council's policy is current and reflects best practice. The policy has been updated to provide a clear and easy to understand explanation about how the Council manages and deals with customer feedback. Key revisions made are highlighted and explained further in section 8.

2. Recommendations

- 2.1 That the updated policy, as contained in Appendix A to this report, is approved by Cabinet.

3. REASONS FOR RECOMMENDATIONS

- 3.1 To ensure that the NHDC Policy for Comments, Compliments and Complaints is up to date and clear and easy for customers and our staff to understand.
- 3.2 To ensure that the definition of a complaint is understood and includes social media as a channel for customer contact and feedback.

4. ALTERNATIVE OPTIONS CONSIDERED

- 4.1 No alternatives have been considered as this is an update to an existing policy

5. CONSULTATION WITH RELEVANT MEMBERS AND EXTERNAL ORGANISATIONS

- 5.1 Consultation with the Local Government Ombudsman has taken place with regards to the handling of social media comments.
- 5.2 Once adopted, the revised policy will be circulated to partner organisations such as Citizens Advice and others who may have contact with our customers.
- 5.3 The Leader of the Council, as the Executive Member responsible for this policy, has been consulted.
- 5.4 A draft report was considered by the Overview & Scrutiny Committee on 16 July 2019 and comments made at that meeting have been incorporated into this report.

6. FORWARD PLAN

- 6.1 This report contains a recommendation on a key decision that was first notified to the public in the Forward Plan on the 15 August 2019..

7. BACKGROUND

- 7.1 North Hertfordshire District Council has a well embedded policy for receiving and handling customer feedback; Comments, Compliments and Complaints (3Cs). This policy has previously been accredited to Quality Management Standard ISO 10002/2004 and follows a structure used by many other Councils and is familiar to the Local Government Ombudsman (LGO).
- 7.2 3Cs are recorded centrally on our corporate Customer Relationship Management (CRM) system by the Customer Services team and are reported corporately to the Council's Senior Management Team as well as to Overview and Scrutiny Committee twice yearly. All Service Managers have access to view the 3Cs for their service via the CRM dashboard.
- 7.3 The 3Cs policy was last updated in 2015 along with a review of the Unreasonable Customer Behaviour and Unreasonable Complainants' policy. A further review has been carried out to bring the policy up to date and to include a section covering how we will respond to 3Cs via Social Media reflecting the growing use of Social Media amongst our customers.

8. RELEVANT CONSIDERATIONS

- 8.1 The updated 3Cs policy is attached as Appendix A with the updates shown as track changes. The reason for bringing this update to Cabinet is to obtain approval for the inclusion of a new section relating to social media. The key updates are explained in more detail below.

- 8.2 **Section 4.4** has an addition regarding complaints about the contractors who provide services on the Council's behalf. All of our contractors have systems in place to enable customers to provide feedback, whether positive or negative. The feedback is recorded and reported to NHDC on a regular basis. Wherever possible we encourage customers to provide feedback / report issues directly to the contractors as they are usually best placed to resolve any issues. This consistent approach also avoids potential duplication of reports and double counting. We do however, recognise that at times we may need to step in if an issue is not being resolved satisfactorily and this is something that the Local Government Ombudsman would expect of us. This section has been updated following the comments from Overview & Scrutiny to make it clearer that the Council will deal with any complaints about a contractor where the customer prefers this or where the matter has not been satisfactorily resolved.
- 8.3 **Section 4.5** has a new addition regarding complaints about staff. A complaint about a staff member may, through the course of the complaint investigation, lead to the matter being considered under the Managing Misconduct Policy. If this is identified early on then it would avoid a member of staff potentially being subjected to two separate investigations regarding the same matter. The policy therefore now states that any concerns in this area require early consultation with HR.
- 8.4 **Section 6.2** has been amended following comments by the Overview & Scrutiny Committee to include clarity on what is a serial, persistent or vexatious complainant.
- 8.5 **Section 7.3** previously concerned letters in the newspaper. This has now been expanded to include social media comments in response to the growing use of social media to interact with us. Since 2018 we have had a separate corporate Social Media policy, which describes our approach to interacting with customers using this channel, however there has been no reference to this channel in the 3Cs policy until now. The Policy has been updated to reflect that comments on social media (similar to letters in the paper) will not **automatically** be formally recorded as complaints. The reason for this approach is detailed in the following paragraphs.
- 8.6 Social media is a growing platform for NHDC customers. We currently have 10,375 followers on Twitter and 2,805 on Facebook. We have high levels of engagement with the outward promotional activity on our pages such as events, job vacancies and Council Meetings. The Communications Team manage the outward activity and have recently recruited a Digital Engagement Officer.
- 8.7 In addition to the outbound activity, our Customer Service Team handle inbound customer service contact from some customers via social media. The contact type ranges from simple questions to specific requests for service. This channel may also be used to complain about or indeed compliment our services.

8.8 We align our social media channel as much as possible with the other traditional channels (telephone, face to-face and email) whilst recognising that not all interactions are specific requests for information or service and that some comments posted will be just online conversation or opinion that it will not be appropriate for us to comment on. If a comment made on social media fits within the clearly defined criteria of a complaint then we will divert the interaction away from social media so that we can privately continue the conversation and initiate the complaints process as appropriate.

8.9 The policy defines a complaint as '*a **specific** expression of dissatisfaction with the quality of a service provided by the Council usually falling under one of the following categories*':

- 1) We have failed to do something we should have.
- 2) We have done something badly or in the wrong way.
- 3) A customer feels they have been treated unfairly or discourteously.

This definition is applicable to comments on social media as well. For example if one customer is contacting us to complain about an ongoing problem that needs escalating then this would meet the complaint criteria, however if several other customers then added their own negative comments of a more general nature then they would not meet the complaint criteria.

8.10 We use a platform called Hootsuite for monitoring and responding to social media contact. This allows us to 'tag' contacts to gather some reporting data regarding the type of contacts we are receiving as well as the volumes. Hootsuite also monitors the sentiment of posts to identify whether a post is negative, positive or neutral in sentiment. Although a useful indicator there are many factors involved with measuring sentiment so it is considered an indicator only and not wholly accurate, for example sarcasm is not easily detected and may be interpreted as positive.

8.11 Hootsuite will also monitor NHDC mentions, which is a social media conversation that we are not directly involved in but are mentioned. We can view these conversations but in most cases it is not appropriate for us to comment or get involved. Hootsuite reports now accompany the 3Cs reports presented to the Senior Management Team and Overview and Scrutiny.

8.12 Consultation has taken place with the Local Government Ombudsman's office to ensure we are aligning with best practice. The LGO is supportive of this approach and is aware that many Councils have not yet included social media within their policy and / or do not accept complaints at all via social media at the moment.

- 8.13 The Unreasonable complainants Policy has also been updated with very minor changes. As part of a corporate approach to reduce the number of separate policies, this has been added to the 3Cs policy as an Appendix, while the unacceptable customer behaviour part of that policy has been incorporated into an existing Health and Safety Policy covering the same subject.

9. LEGAL IMPLICATIONS

- 9.1 Section 5.6 of the Council's Constitutions sets out the functions of the Cabinet. Section 5.6.1 states:

"To prepare and agree to implement policies and strategies other than those reserved to Council".

- 9.2 There is no statutory requirement for adopting a 3C's policy or equivalent but the Council chooses to do so as a matter of good practice and good customer service.

10. FINANCIAL IMPLICATIONS

- 10.1 There are no financial implications arising from this report.

11. RISK IMPLICATIONS

- 11.1 A fit for purpose 3C's policy is important in terms of managing complaints in a fair, transparent and equitable way. It is an important tool in effectively managing 3C's and evidencing that this has been done, should a complaint be escalated to the Local Government Ombudsman.
- 11.2 Failure to address the growing importance of Social Media as a means of customer contact and feedback within the 3C's policy, may lead to the risk of reputational damage to the Council.

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 This policy applies to all customers and therefore there are no specific equalities implications. To further assist those that exhibit a protected characteristic, additional assistance will be provided to any customer who has difficulty in making a 3C.
- 12.3 An Equalities Impact Assessment will be carried out after all consultation has taken place.

13. SOCIAL VALUE IMPLICATIONS

13.1 The Social Value Act and “go local” policy do not apply to this report.

14. HUMAN RESOURCE IMPLICATIONS

14.1 Sometimes complaints are received about the conduct of staff. There are policies in place to deal with these situations, which ensure that any investigations are carried out in a transparent manner for the member of staff concerned and that specific processes are followed.

15. APPENDICES

15.1 Appendix A – Comments, Compliments and Complaints Policy Updated July 2019

16. CONTACT OFFICERS

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17. BACKGROUND PAPERS

17.1 None