



South Cambridgeshire District Council Feedback and Complaints Policy

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Introduction

South Cambridgeshire District Council is committed to being ‘A Modern and Caring Council’, as set out within our [2020-2025 Business Plan](#). This means providing customers with high-quality services, including efficient, transparent, and open feedback and complaints handling processes.

This document sets out how customers can submit feedback and complaints, and what customers can expect from these processes. At the heart of this approach, we aim to identify and put right where something has gone wrong, and to learn from the feedback and complaints that we receive.

What is a Complaint?

Within their document, ‘Guidance on Running Complaints Systems’ (2018), the Local Government Ombudsman describes a complaint as:

“An expression of dissatisfaction about a council service (whether that service is provided directly by the Council or by a contractor or partner) that requires a response.”

This is the definition that the Council will use for the purposes of this policy and our complaints handling processes.

As per Local Government Ombudsman guidance, we do not differentiate between ‘formal’ and ‘informal’ complaints. These terms both refer to expressions of dissatisfaction that require a response. As such, all complaints will be dealt with as outlined within this policy.

Exceptions

The below sections provide details of other types of communication and feedback that we receive, but which are not dealt with as complaints. These exceptions each have their own separate processes, as detailed below.



Service Requests

A service request is a request for any service that the Council provides, ranging from bin collections and fly-tipping clean-up, to assessment of benefit entitlement and determination of planning applications.

Customers can submit a service request either by logging into the [My South Cambs](#) online portal, where a range of e-forms are available, or by completing an e-form on [our website](#) as a guest (no log-in required). Upon completion and submission of an e-form, this will be allocated to the appropriate team to act upon. Where customers require support to submit a service request online, this can be provided by calling our Customer Contact Service.

Service requests are not treated as complaints and are governed by our general customer service standards (these can be found on [Contact Us section of our website](#)), or service specific targets for completion.

Feedback

We encourage customers to provide feedback, whether good or bad, about the services that they have received. Feedback is used to plan how we will deliver and improve our services going forward and is not generally treated as a complaint. Exceptions may occur where the customer has chosen to leave their contact details (allowing us to respond) and where we decide that a piece of feedback warrants investigation and response. In such cases, the customer will be contacted to ask whether they wish their case to be considered as a complaint. Once this has been confirmed, we will set this up as a complaint on the [My South Cambs](#) complaints portal and follow the complaints processes set out later on in this document.

We are in the process of rolling out a series of feedback forms in relation to each of our services, allowing customers to provide feedback in relation to a specific service that they have received. These feedback forms will be available on the section of our website that relates to the service in question (for example, the Benefits section) and on a specific feedback page. They will also be available through the [My South Cambs](#) customer portal. Feedback can be provided either anonymously or with customer details included. Until such time as all of our services have feedback



forms available, feedback can also be submitted through the feedback@scambs.go.uk email address.

Going the Extra Mile Awards Staff Recognition Scheme

If a customer feels they have received service that goes above and beyond the norm, or that employees or teams have made a significant positive difference, they can also choose to submit a nomination for our 'Going the Extra Mile Awards' staff recognition scheme. The emphasis of the recognition scheme is on customer service and service improvement. Further information about the awards scheme, plus a Going the Extra Mile nomination form can be found on [our website](#) (search Going the Extra Mile).

Other Exceptions

In addition to service requests and feedback (as detailed above), the following circumstances are not dealt with under the complaints handling processes detailed within this policy:

- Instances where the customer has a right to appeal or legal action, and where it is reasonable to expect them to have done so (for example, a Planning appeal, Housing Benefit tribunal or Homelessness appeal).
- Complaints that relate to issues that the customer became aware of more than 12 months ago.
- Complaints relating to the conduct of Councillors. These are dealt with under the Council's Code of Conduct Complaints Procedure.
- Complaints made by suppliers, partners, and other public authorities regarding our business relationships.
- Internal (including from either staff or Councillors) complaints made about staff conduct. These are dealt with under our HR policies and procedures.
- Complaints that are not about the Council, including complaints about Ermine Street Housing (these are dealt with by Ermine Street Housing under their own complaints policy).

Where a matter is submitted as a complaint but falls within any of the categories detailed above (including service requests and feedback), we will contact the customer and provide an explanation



of this, before closing the complaint on our system and signposting them to the correct process. In these instances the customer has the right to contact the relevant Ombudsman (see Stage 3 of the complaints process below), and to ask them to review this decision if they believe it to be incorrect.

The Three Stages of the Complaints Process

We recognise that on occasion we make mistakes, and that this can lead to complaints that require investigation and response.

There are three stages of complaint that can be submitted about us, starting with Stage 1, and progressing to Stage 2 and Stage 3. Details of each stage are provided below.

Stage 1

If a customer wishes to submit a complaint, prompting an investigation and response, Stage 1 is the first step for this.

Stage 1 complaints can be submitted through the [My South Cambs](#) customer portal. Where customers require support to submit a Stage 1 complaint through the customer portal route, this can be provided by calling our Customer Contact Service. Where a communication is received by other means (for example, an email or letter) and it is clearly intended as a complaint, we will set this up as a complaint on the My South Cambs customer portal, contacting the customer for more information if this is required.

Once a Stage 1 complaint has been received, this will be allocated to the service manager or nominated team leader from the relevant area to act as Responding Officer for the complaint. This role includes responsibility for reviewing, investigating, and responding to the complaint to communicate findings from the investigation. Throughout the complaint investigation process the Responding Officer is also responsible for communicating with the customer, including to request further information or provide information on the progress of the complaint. Please see the later 'Tracking and Communications During Stage 1 and 2 Complaints' section for further details about



how the progress of the complaint can be tracked and communication will take place between the customer and the Responding Officer during the investigation.

Our target is to complete the Stage 1 review, and to have sent a response setting out our findings, within 10 working days of receipt of the Stage 1 complaint. On occasion, it may not be possible to meet this target due to the need for more in-depth investigation. In these instances, we will inform the customer of a revised and realistic target timescale at the earliest opportunity. This is intended to ensure complaints are investigated effectively and that customers are kept up to date with the progress of their complaint during more complex cases and is not to be relied upon to provide additional time as a matter of course.

We aim to address complaints effectively at Stage 1 of the complaints process, avoiding the need for subsequent stages, however where this is not possible the next stage is to submit a Stage 2 complaint.

Stage 2

A complaint is submitted at this stage when the customer is dissatisfied with the result of a Stage 1 complaint. Under Stage 2 of the complaints process, the Responding Officer role is undertaken by the Head of Service from the relevant area or a nominated alternative (this person will be independent from the review undertaken at Stage 1).

Once a Stage 2 complaint has been received, this will be allocated to the service manager or nominated team leader from the relevant area to act as Responding Officer for the complaint. As with Stage 1 of the complaints process, this role includes responsibility for reviewing, investigating, and responding to the complaint to communicate findings of the investigation. They are also responsible for communicating with the customer, including to request further information or to provide information on the progress of the complaint. Please see the later 'Tracking and Communications During Stage 1 and 2 Complaints' section for further details about how the progress of the complaint can be tracked and communication will take place between the customer and the Responding Officer during the investigation.



Our target is to complete the Stage 2 review, and to have sent a response detailing our findings, within 20 working days of receipt of the Stage 2 complaint. On occasion, it may not be possible to meet this target due to the need for more in-depth investigation. In these instances, we will inform the customer of a revised and realistic target timescale at the earliest opportunity. This is intended to ensure complaints are investigated effectively and that customers are kept up to date with the progress of their complaint during more complex cases and is not to be relied upon to provide additional time as a matter of course.

Tracking and Communication During Stage 1 and 2 Complaints

During a Stage 1 and Stage 2 complaint investigation, the customer can track the progress of their complaint through their [My South Cambs](#) customer portal account. This account can also be used for communication between the Responding Officer and customer, through the option to leave a 'note', as well as for uploading documents that relate to the complaint. During the investigation, the Responding Officer will often make use of the 'notes' feature to ask for additional information in relation to the complaint, or to provide an update on the investigation. If the Responding Officer leaves a 'note' for the customer, or uploads a document to the account, the customer will receive an email drawing attention to this.

There may be occasions where it is more appropriate for alternative communication methods to be used during a complaint investigation, for example email or a telephone conversation. In all cases, a record of the communications that take place will be kept on the customer's My South Cambs account, whether that is a copy of an email that has been sent or received, or a written record of a telephone or face-to-face conversation.

Complaint Responses

In all cases the final complaint response that sets out the findings of our investigation, will be communicated to the customer in writing. This may be by letter, email or 'note' on the My South Cambs customer portal. Whichever of these options is used, the final complaint response will always be made available to view on the [My South Cambs](#) customer portal.



Stage 3

If a complainant is dissatisfied with the outcome of the Stage 2 complaint, they may wish to enter Stage 3 of the complaints process by submitting their complaint about the Council to the [Local Government Ombudsman](#), or to the [Housing Ombudsman](#) for complaints relating to our relationship as a landlord to our housing tenants or leaseholders. The Local Government Ombudsman and Housing Ombudsman aim to remedy injustices through impartial, rigorous, and proportionate investigations into complaints about local government and social housing organisations respectively.

Once we are notified by the Local Government Ombudsman or Housing Ombudsman that a Stage 3 complaint has been submitted, it will be passed to the appropriate Head of Service, who will review the complaint and respond directly to the relevant ombudsman within 28 days (calendar rather than working days).

Following investigation, either the Local Government Ombudsman or Housing Ombudsman (depending on the nature of the complaint, as detailed above) will write to the customer notifying them of their decision. The Council will also receive a copy of their findings, with relevant action points, if applicable.

Submitting Stage 3 Complaints to the Local Government Ombudsman

Stage 3 complaints that do not relate to our role as a housing landlord, are submitted by the complainant contacting the Local Government Ombudsman directly. Please note that any complaints relating to our Housing Options and Advice service fall within the remit of the Local Government Ombudsman and not the Housing Ombudsman. The Local Government Ombudsman will not usually investigate complaints unless we have had an opportunity to investigate at Stages 1 and 2 first.

Contact details for the Local Government Ombudsman Service are:

Local Government and Social Care Ombudsman

PO Box 4771

Coventry

CV4 0EH

Telephone: 0300 061 0614



Web: <https://www.lgo.org.uk/>

Submitting Stage 3 Complaints to the Housing Ombudsman

Stage 3 complaints that relate to our relationship as a landlord to our housing tenants or leaseholders should be referred to the Housing Ombudsman. At present (October 2021) this may be by a 'designated person' (a local MP or a South Cambridgeshire District Council Councillor) at any time following completion of our Stage 2 complaints process. Alternatively, a tenant can submit directly to the Housing Ombudsman if more than 8 weeks have passed since the completion of our Stage 2 process.

The role of the designated person in this process was introduced by Government in 2011 to improve the chances of complaints about housing being resolved locally. However, it should be noted that the draft Building Safety Bill includes amendments that will remove this role and the requirements detailed above should the Act become law.

Please note that any complaints relating to our Housing Options and Advice service fall within the remit of the Local Government Ombudsman and not the Housing Ombudsman.

Contact details for the Housing Ombudsman Service are:

Housing Ombudsman Service

PO Box 152

Liverpool

L33 7WQ

Telephone: 0300 111 3000

E-mail: info@housing-ombudsman.org.uk

Web: www.housing-ombudsman.org.uk

Third Parties

For all complaints and at any stage of the complaints process, a complainant can request that a third party is able to act on their behalf to progress the complaint. A third party can be anyone who the complainant wishes to act on their behalf (as opposed to the 'designated person' role for



Housing complaints, where the individual is required to be a local MP or South Cambridgeshire District Council Councillor). In line with GDPR requirements we will require written permission from the resident to discuss this on their behalf. This arrangement can be requested either at the time of submission of the complaint, or at a later date.

Multi-service and Shared Service Complaints

Some complaints that we receive relate to more than one service area. In these cases, a lead service will be identified to coordinate a review of the complaint and arrange a joint response detailing their findings.

In cases that relate to a service that we share with another local authority (for example, the Shared Waste Service or the Greater Cambridge Planning Service), the complaint will be dealt with by the lead authority for that shared service.

Anonymous Complaints

As detailed earlier in this document, the Local Government Ombudsman defines a complaint as “an expression of dissatisfaction about a council service...that requires a response.” On this basis, complaints cannot be submitted anonymously, as this prevents us from being able to issue a response. All complaints that we receive are treated professionally and in confidence, however for customers wishing to report an issue about the Council anonymously, this can be done through the completion of a feedback back form, as detailed within the section of this policy title ‘Feedback’.

Vexatious or Unreasonably Persistent Complaints

What is a Vexatious or Unreasonably Persistent Complaint?

We recognise that customers are likely to be persistent when they believe they have been subjected to a mistake or failure. In most cases, this persistence is reasonable and justified. As outlined by the Local Government Ombudsman, the point at which persistence becomes unreasonable, is when the nature or frequency of a customer’s contact with us starts to hinder the consideration of their, or other people’s complaints. This could either be during, or following the completion, of a complaint investigation. A list of examples of unreasonable actions or behaviours is included at Appendix B.



Designating a Complaint as Vexatious or Unreasonably Persistent

The complaints process is intended to give redress to residents and businesses where they do not agree that the Council has dealt with their case or service request correctly. It is not intended as an alternative to an appeals process, or to making representations as part of a decision-making process. It is expected that both the Council and the complainants use this process in good faith. Where the Council concludes that an individual or organisation is not using this complaints process in the spirit in which it is intended it can – with the agreement of the Council’s Leadership Team – designate a complaint, individual and/or organisation as being vexatious or unreasonably persistent.

Where this decision is made the Council will record the decision and the reasons for making it, set a decision review date (of no longer than 18 months), and communicate this to the customer. The results of the review will again be agreed with the Council’s Leadership Team.

Before designating a complaint, person or organisation as vexatious or unreasonably persistent, we must first be satisfied (and record our satisfaction on file) that:

- the complaint is being or has been investigated properly and in accordance with this policy
- any decision reached is the right one
- communications with the customer have been adequate
- the complainant is not now providing any significant new information that might affect the organisation’s view on the complaint

Where a person or organisation is designated as a vexatious or unreasonably persistent complainant the Council reserve the right not to respond to the complaint or correspondence relating to it. Where this is the case, future correspondence will continue to be read and placed on file but not acknowledged, unless it contains material new information.

In all cases the objective is to take a proportionate approach to ensuring that complaints can be dealt with quickly, fairly and without distraction. Other examples of action that may be taken are:

- Placing limits on the number and duration of contacts with staff per week or month
- Offering a restricted time slot for necessary calls



- Limiting the complainant to one medium of contact (for example, telephone, letter, or email)
- Requiring the complainant to communicate only with one named member of staff
- Requiring any personal contacts to take place in the presence of a witness and in a suitable location
- Refusing to register and process further complaints about the same matter

Records will be kept detailing all decisions on whether to apply the policy in response to a staff request, including instances where this decision is not taken.

There is no right of appeal against decisions to designate a complaint, person or organisation as vexatious and unreasonably persistent. If a customer believes that they have been unfairly treated through this process, they may wish to complain to the Local Government Ombudsman or Housing Ombudsman.

Violent or Abusive Behaviour

We understand how distressing it can be if things go wrong, however it is important that we all ensure that communications do not become abusive.

Abusive behaviours include swearing, shouting or any type of physically or verbally threatening behaviour, and will not be tolerated and will result in steps being taken to protect our staff and contractors. These may include (but are not limited to) the restriction of access to our offices, or the requirement for all communication to be undertaken in writing. Further information can be found within our policies and reporting guides relating to health and safety and violence at work.

Our Commitments

In all instances, we will deal with complaints in accordance with our organisational values of 'working together', 'integrity', 'dynamism', and 'innovation'. Appendix A sets out how each of these values are applied in relation to this policy and its associated processes, however it is worth emphasising the importance of frequent and effective communication with the customer, in relation to the achievement of each of these headings.



Reasonable Adjustments

As a council, we are committed to delivering services that narrow the gap in outcomes between disadvantaged groups and the wider community, and to ensuring that protected groups are included and have their voices heard (see our [Equality Scheme](#) webpages for more information). We are also obliged to comply with the Equality Act 2010 and Public Sector Equality Duty.

One way that we can meet these objectives is by ensuring that we make reasonable adjustments to our practices to avoid or correct any disadvantage that may be experienced by those with protected characteristics. This could include (but is not limited to):

- Use of a particular communication method that best suits the customer's needs
- Provision of information in appropriate alternative formats (for example large print, Braille, coloured paper)
- Provision of translation or interpreting services, for example, to translate a document or interpret a conversation to a different language user (including sign language)

In the majority of cases, we will be able to agree and deliver the required reasonable adjustments with minimal delay, but in some cases, we may need to consider or seek advice on how we can adjust our processes to best meet the needs of the customer. In all cases we will discuss requirements with the customer.

In deciding what is reasonable, the Equality and Human Rights Commission suggest that the most relevant factors are:

- The effectiveness of the adjustment(s) in preventing or reducing the disadvantage for the disabled person
- The practicality of making the adjustments
- The availability of resources, including external assistance and finance
- Any disruption to the service that making the adjustment may cause



Learning from Feedback and Complaints

We value complaints as an opportunity to identify areas for improvement, forming the basis for continual organisational, service, and individual development.

Our performance in relation to complaints handling is monitored through key performance indicators, reported quarterly to senior management and Councillor committees. Regular reviews of data and feedback allow the management of complaints handling processes on a day-to-day basis, with learning shared across our services. Reviews also take place in relation to any Stage 3 decision notices that are received, as well as Ombudsman annual review letters.



Appendix A – Council Values and the Complaints Handling Process

SCDC Value	Application to Complaints Policy
Working Together	<ul style="list-style-type: none">- Working with customers and colleagues to try and resolve issues before they become complaints, and to prevent Stage 1 complaints from progressing to Stage 2 and 3 wherever possible.- Communicating with customers to fully understand the nature of the complaint and their expectations.- Working with colleagues from across our services to review complaints and clearly communicate outcomes to customers.- Sharing learning, information, knowledge, and resources across the organisation in relation to complaints handling to continuously seek to improve our complaints handling processes.
Integrity	<ul style="list-style-type: none">- Communicating with customers in an open, honest, and professional manner throughout the course of the complaints process.- Promises are kept throughout the complaints process.- If we are at fault, we will acknowledge this, apologise, and set out any measures that are being taken to put things right.- There are clear lines of accountability within the complaints process.
Dynamism	<ul style="list-style-type: none">- Complaints are handled, reviewed, and responded to with energy and drive, as part of our commitment to provide our customers with high-quality services.- Complaints are valued as opportunities to identify areas for improvement, and form the basis for continual organisational, service, and individual development.
Innovation	<ul style="list-style-type: none">- Ideas and opportunities for improvements arising from complaints are shared with colleagues.- We continually strive to improve by reflecting, learning from, and developing as a result of complaints.



Appendix B – Examples of Unreasonable Actions and Behaviours

The Local Government Ombudsman provides the following examples of unreasonable actions and behaviours, which could trigger the introduction of one or more of the measures detailed within the 'Unreasonable or Unreasonably Persistent Complaints' section of this policy:

- Refusing to specify the grounds of a complaint, despite offers of help.
- Refusing to cooperate with the complaints investigation process.
- Refusing to accept that certain issues are not within the scope of a complaints procedure.
- Insisting on the complaint being dealt with in ways which are incompatible with the adopted complaints procedure or with good practice.
- Making unjustified complaints about staff who are trying to deal with the issues, and seeking to have them replaced.
- Changing the basis of the complaint as the investigation proceeds.
- Denying or changing statements he or she made at an earlier stage.
- Introducing trivial or irrelevant new information at a later stage.
- Raising many detailed but unimportant questions, and insisting they are all answered.
- Submitting falsified documents from themselves or others.
- Adopting a 'scatter gun' approach: pursuing parallel complaints on the same issue with various organisations.
- Making excessive demands on the time and resources of staff with lengthy phone calls, emails to numerous council staff, or detailed letters every few days, and expecting immediate responses.
- Submitting repeat complaints with minor additions/variations the complainant insists make these 'new' complaints.
- Refusing to accept the decision; repeatedly arguing points with no new evidence.



Appendix C – Responsibilities

Group	Complaints Handling Responsibilities
All	<ul style="list-style-type: none">- Inform the Complaints Champion for the service in question of any complaints received through channels other than the 'My South Cambs' customer portal.- Apply the Council's values (see Appendix A) to provide a high level of customer service, to try and resolve issues before they become complaints, and prevent Stage 1 complaints from progressing to Stage 2 and 3.
Service Area Complaints Champions	<ul style="list-style-type: none">- Ensure all complaints and updates are promptly logged on the 'My South Cambs' customer portal for their service.- Coordinate responses to complaints for their service area, interacting with the complaints portal, assigning complaints to Responding Officers, and liaising with Responding Officers to ensure target response times are met wherever possible. Where not possible, ensure that customers are informed of a revised and realistic timescale at the earliest opportunity.- Act as key point of contact for queries and information requests in relation to complaints handling in their service, including the provision of data as required.
Corporate Complaints Manager	<ul style="list-style-type: none">- Provide operational management of complaints handling processes and ensure consistent implementation of the SCDC Feedback and Complaints Policy across all services.- Liaise with Service Area Complaints Champions, providing an escalation and distribution route for issues and learning, and escalating major issues to the Head of Transformation, where necessary.- Act as key point of contact for queries and information requests in relation to Council-wide complaints handling.- Maintain a log of all decisions to designate a complaint as vexatious or unreasonably persistent.



Group	Complaints Handling Responsibilities
Responding Officers	<ul style="list-style-type: none"> - Review, investigate, and respond to complaints allocated by Service Area Complaint Champions, communicating findings to the customer through the 'My South Cambs' customer portal. - Maintain effective communication with the customer, including requests for information and progress updates. - Inform customers of revised and realistic target timescales at the earliest opportunity, where it will not be possible to meet standard response times for Stage 1 and Stage 2 complaints due to the need for more in-depth investigation. - In liaison with Service Area Complaints Champions, ensure that the 'My South Cambs' customer portal is updated with details of all communications and notes in relation to complaints that are in progress or that have been completed.
Service Managers	<ul style="list-style-type: none"> - Act as Responding Officer in relation to Stage 1 complaints that relate to their service area (see responsibilities under 'Responding Officers' section above).
Heads of Service	<ul style="list-style-type: none"> - Act as the Responding Officer in relation to Stage 2 complaints that relate to their service area, or appoint a nominated alternative officer, independent from the Responding Officer at Stage 1, to complete this task (see responsibilities under 'Responding Officers' section above). - Review Stage 3 complaints and respond directly to the relevant ombudsman within 28 days.
Head of Transformation	<ul style="list-style-type: none"> - Ownership and championing of the SCDC Feedback and Complaints Policy, procedures, and performance. - Act as escalation point for any major issues arising from the Corporate Complaints Manager.
Leadership Team	<ul style="list-style-type: none"> - Review and scrutinise performance, and where necessary, agree action to positively influence performance levels. - Decide, communicate, and review appropriate action in response to vexatious and unreasonably persistent complaints.
Councillors	<ul style="list-style-type: none"> - Review and scrutinise performance, and where necessary, suggest action to positively influence performance levels.