

## FINAL INTERNAL AUDIT REPORT

### AUTHORITY WIDE

#### COMPLAINTS 2022/23

**Issued to:** Assistant Director Strategy, Performance and Corporate Transformation  
Head of Customer Engagement & Complaints  
Head of Performance Management & Business Support  
Director of Children, Education and Families  
Director of Environment and Public Protection

**Prepared by:** Internal Auditor (Mazars LLP)

**Reviewed by:** Manager (Mazars LLP)  
Partner (Mazars LLP)

**Date of Issue:** 10th May 2023

**Report No.:** AW/06/2022

## INTRODUCTION

1. This report sets out the results of our internal audit of Complaints. The internal audit was carried out as part of the work specified in the 2022-23 Internal Audit Plan. The controls we expect to see in place are designed to minimise the Council's exposure to a range of risks. Weaknesses in controls that have been highlighted will increase the associated risks and should therefore be addressed by management.
2. The Council has a two-stage complaints procedure as set out below:
  - **“Stage 1:** Please report your complaint to us. You can use our online complaints form to do so and can attach documents or photographs if you wish. Your complaint will be acknowledged within three working days. The Manager of the service concerned will investigate the complaint and reply to you within 20 working days. If the issue is more complicated it may take longer, but we will let you know if we need more time to investigate and respond. Timings may be different for complaints about Children's Social Care.
  - **Stage 2:** We can usually resolve complaints at Stage 1, but in the unfortunate event that you remain dissatisfied with the Council's response, you can contact the Local Government Ombudsman. This independent organisation investigates complaints against Councils. There is no charge for this service, but the Local Government Ombudsman will usually only consider your complaint after you have given us the opportunity to resolve matters for you.”
3. Members of the public raise complaints through various mediums, such as the online form within the complaints section on the Council website, an email to the service area, letters, and phone calls.
4. Complaints are handled mainly by the designated Complaints Team. However, complaints concerning Environment and Public Protection and Neighbourhood Management are logged and responded to by their respective internal teams.
5. We would like to thank everyone contacted during this review for their help and cooperation.

## AUDIT SCOPE

6. The original scope of the internal audit was outlined in the Terms of Reference issued on 15 February 2023.
7. We reviewed and tested controls over the following key risks:

- If internal procedures setting out responsibilities and lines of accountability are not documented, there is a risk that the Complaints Team and service lines do not handle all complaints consistently to a satisfactory standard or promptly.
- If internal procedures do not set out escalation protocols, there is a risk that complaints are not dealt with promptly.
- A lack of an adequate centralised case management system could lead to ineffective management of complaints and customer dissatisfaction.
- Complaints not referred to in time to the relevant area could present reputational damage to the Council due to inadequate responses or delayed actions.
- Where poor performance is not identified and/or addressed promptly, there is a risk that underperformance continues leading to poor customer service.

**AUDIT OPINION**

8. Our overall audit opinion, number and rating of recommendations are as follows.

AUDIT OPINION	
<b>Reasonable Assurance</b>	There is generally a sound system of control in place, but there are weaknesses which put some of the service or system objectives at risk. Management attention is required.

Number of recommendations by risk rating		
Priority 1	Priority 2	Priority 3
0	5	2

**SUMMARY OF FINDINGS**

9. Our audit identified areas of good practice and sound controls, as well as areas for development. These are set out below:

*Policies and Procedures*

- Policies related to complaints are available on the Council’s website for the public to access. Both the Corporate Complaints Policy (CCP) and the Children’s Statutory Complaints Policy (CSCP) are available for members of the public to download.
- The CCP was last reviewed in April 2017. Although there have been ad hoc instances where the Policy has been discussed and reviewed, the Policy is not subject to formal reviews.

- Information regarding complaints is available for staff on the Council's SharePoint. This includes policies and guidance on writing replies and signposting to the Local Government and Social Care Ombudsman (Ombudsman) where necessary.
- We confirmed that the Head of Customer Engagement & Complaints provided training to staff members supported by a complaints training course presentation. A further PowerPoint named 'Children Act Complaints Training for Complaints Managers' from 2021 was reviewed, where an external speaker gave training on children's complaints and relevant legislation.
- We confirmed that there are clear lines of accountability and responsibilities for the Corporate Complaints, Environmental and Public Protection and the Neighbourhood Management teams. These are laid out in either structure charts or process maps.

#### *Receipt, Recording, and Allocation of Enquiries*

- We selected a sample of 14 corporate complaints received between April and December 2022 to assess whether they were accurately recorded and acknowledged.
  - In 12 cases, the complaints were recorded accurately. Two complaints were recorded after the Corporate Complaints Team had received the complaint. In response, management advised us that this was due to the directorate not informing the Complaints Team of the complaint.
  - We found that 12 cases had been acknowledged within three working days per the Policy.
- We selected a sample of ten Environmental and Public Protection complaints from April to December 2022 to assess whether they were recorded and allocated appropriately and in line with the CCP. Of these ten complaints, six were related to public protection, two were concerned with highways, and one each for parks and traffic.
  - All ten cases were recorded on the tracker. However, some of these were not closed accurately. The Head of Performance Management advised us that not all cases have a reference number if raised directly with service areas.
  - All ten complaints were acknowledged per the three working days timescale on the Policy.
  - One was recorded on the tracker late, and four had been closed before the response was sent.
- Similarly, for Neighbourhood Management complaints, we selected a sample of ten complaints from August 2022 to January 2023. Seven complaints were related to waste, and one each for enforcement, drainage, and street cleansing.
  - We noted that six of these neighbourhood management complaints were not acknowledged. Furthermore, whilst two did have an acknowledgement, this was not within the three working day timeframe.

- On the neighbourhood management complaints log, we could not locate a column for when the response to the complaint was due.
- We also tested and raised a 'dummy' complaint to assess whether a corporate complaint would be captured via the website form. This dummy complaint was concerned with Housing and Adult Social Care.
  - Shortly after filling details of the complaint on the Council website, we received a receipt email with a reference of 81587.  
An acknowledgement email was received within three working days per the Policy.

### *Investigation*

- Our sample testing of the samples mentioned above confirmed that all 34 complaints tested had a designated Officer responsible for monitoring and dealing with the complaint.
- From the sample of 14 corporate complaints, we found examples of good practices where allocated Officers would send reminders to service areas when the response date was nearing.
- The Corporate Complaints Team sends weekly status reports to service areas across the Council. These detail the reference number, the title of the complainant, the service area, and its due date. For example, from a weekly report to Education dated 21 February 2023, we noted that one complaint was 64 working days late.
  - We noted the automated weekly emails sent out by System A, to Education, Housing, Planning and Carelink on 24 February 2023. The emails are sent to various members of staff within the respective divisions.
  - We noted that one complaint for planning and regeneration is 221 working days overdue, and a housing complaint is 235 working days overdue.
- We conducted a dummy test complaint for Greenspaces and Parks on the Council's website and confirmed it was captured with a reference number provided. We also received confirmation that the report had been logged and that it would be addressed as part of routine grounds maintenance. The Head of Performance Management advised that contract complaints would be escalated to the Council by the relevant contractor.

### *Review and Issue of Responses*

- From our previously selected sample of complaints, we assessed whether the complaints were responded to within the 20 working days timescale stated on the Policy and if holding replies were sent when responses were late.

- Two environmental and public protection complaints and two neighbourhood management complaints were responded to late without a holding letter.
- We noted that six corporate complaints were responded to late.
- Furthermore, we selected nine cases from April to December 2022 with an Ombudsman reference on System A. We confirmed that each case had an allocated Officer, and no issues were noted in eight of these escalations. In the remaining case, we noted an allocated Officer, but this was dealt with late and led to a query by the Ombudsman.

#### *Performance Monitoring and Reporting*

- A monitoring framework is evident in the complaints process, with data being collated and shared quarterly and annually.
  - Environment complaints data showed the number of complaints received and differentiated between Highways, Neighbourhood Management, Public Protection and Traffic. For example, the below shows the three quarters for 2022-23.
    - Quarter 1: 50 complaints with 100% response in 20 working days;
    - Quarter 2: 44 complaints with 100% response in 20 working days, and
    - Quarter 3: 38 complaints with 100% response in 20 working days.
- We cross-referenced the environmental and public protection reported quarterly complaints with the environmental complaint tracker. We noted that on the annual complaints report 2021-22, once excluding neighbourhood management complaints, the total number of complaints was 41. However, on the complaint's tracker, only 40 could be located. This was a missing public protection complaint. Once we raised this, we were advised that this was due to reclassification.
- We cross-referenced the neighbourhood management complaints for each quarter on the quarterly reports to the neighbourhood management log. We found that there were discrepancies for quarter two and quarter three. When we raised this, management advised us that the Officer had recounted and that there was one extra neighbourhood management complaint for both quarters on the reports due to reclassifications undertaken post-reporting.
- From the annual complaints report, we confirmed that other divisional annual statistics and trends are given separately for Adult Social Care, Children's Social Care, and Education. Compliments and a summary of the Ombudsman cases for each service area report were stated within the reports.

- Within System A, we confirmed there is also a requirement for the Officer to answer, yes or no, whether there have been any lessons learnt from handling the complaint. We found that out of 347 Corporate complaints from April to December 2022 on System A, 42 cases had the Officer noting that lessons were to be learnt.
- As part of the monitoring framework, a monthly Customer Engagement and Complaints team meeting is held with senior members of the complaints, freedom of information, and subject access request team attending. We were provided monthly meeting minutes for October, December 2022 and January 2023, which showed consistently that complaint handling is agenda item four and specific cases are item six.

**DETAILED FINDINGS / MANAGEMENT ACTION PLAN**

10. The findings of this report and an assessment of the risk associated with any control weaknesses identified are detailed in the Detailed Findings / Management Action Plan. Any management recommendations are prioritised in line with the criteria set within Appendix B.



<b>1. Review of the Corporate Complaints Policy</b>	
<p><b><u>Finding</u></b></p> <p>We noted that the CCP, which outlines how the Council handles complaints, was formulated in April 2017. We were provided evidence that this Policy has been reviewed ad hoc and informally. For example, we reviewed the minutes of an EPP management meeting on 3 February 2022, where the environmental aspect of complaints was reviewed.</p> <p>Matters discussed in this meeting included the website and forms to request a complaint, adding information to our ECS system for members to submit complaints and corporate complaints management. However, the Policy does not have version control indicating when it was last reviewed and the next review date. There is no evidence of a formal periodic review of the processes and the Policy.</p> <p>We noted within section seven of the Policy that a holding letter would be sent to the complainant if the Council cannot send a response within a 20 working day timescale. However, as detailed below, a holding letter was either not sent or sent late on numerous occasions.</p> <p><b><u>Risk</u></b></p> <p>If the CCP is not formally reviewed internally, it may become outdated or may no longer reflect the procedures that are carried out when handling complaints at the Council. Therefore, inconsistent and unprofessional processes may be followed when dealing with complaints.</p>	
<p><b><u>Recommendation</u></b></p> <p>The Council should ensure the CCP is reviewed periodically and this exercise is captured/documentated within the Policy. This should include documented version control to assess when it was last reviewed.</p>	<p><b><u>Rating</u></b></p> <div style="border: 1px solid black; background-color: #90EE90; padding: 5px; display: inline-block;">Priority 3</div>
<p><b><u>Management Response and Accountable Manager</u></b></p> <p>Whilst our policy and procedures are informally discussed annual to ensure ongoing suitability, it is acknowledged that there is not currently a formal review process reported to PDS. Starting from 2023 and biannually thereafter, a review of the policy/ies will be put in place will be incorporated into the covering report to the Council's Annual Report on Complaints as it goes through its committee stages.</p> <p>Head of Customer Engagement &amp; Complaints</p>	<p><b><u>Agreed timescale</u></b></p> <p>Est. July 2023</p>

2. Neighbourhood Management Log	
<p><b><u>Finding</u></b></p> <p>We reviewed the master log for complaints concerning neighbourhood management as of 20 February 2023. This includes waste, street cleaning and drainage complaints.</p> <p>Within the log, we confirmed there are details regarding the complainant, the date the complaint was raised, and by whom it was resolved. However, unlike the System A used for Corporate complaints, we noted no column for when the response was due.</p> <p>This may lead to late responses as below:</p> <ul style="list-style-type: none"> <li>○ Waste Complaint: Received on 01 December 2022 but not formally responded to until 23 February 2023.</li> <li>○ Waste Complaint : Received on 25 January 2023 but not formally responded to until 21 February 2023.</li> </ul> <p><b><u>Risk</u></b></p> <p>Neighbourhood Management complaints may not be monitored well and may be sent late.</p>	
<p><b><u>Recommendation</u></b></p> <p>Management should enhance the Neighbourhood Management Log to include the timescales of when neighbourhood management complaints are due.</p>	<p><b><u>Rating</u></b></p> <div style="border: 1px solid black; background-color: #90EE90; padding: 5px; display: inline-block;">Priority 3</div>
<p><b><u>Management Response and Accountable Manager</u></b></p> <p>It is unfortunate that the NM complaints log that was viewed by the auditor had no due date SLA captured. NM agree with the auditor that this is a fundamental requirement for tracking responses within SLA and the column was always present on previous versions as the screen shot shows.</p>	<p><b><u>Agreed timescale</u></b></p> <p>Immediate effect</p>

The 'due by' SLA column has now been included on the latest log, with a 'resolved date' and 'final letter' date sent column also included.

Head of Performance Management & Business Support.

### 3. Recording of Environmental and Public Protection (EPP) Complaints

#### Finding

We selected a sample of ten environmental and public protection complaints received between April and December 2022 to assess whether they were recorded appropriately.

We noted that in one complaint relating to public protection, although the service area received the complaint on 27 July 2022, it was recorded on the tracker as being raised on 4 August 2022.

Furthermore, in the following four cases, we noted that the dates on the tracker for when the complaint was closed did not match the date the response was sent:

- A public protection complaint that was responded to on 10 November 2022 and stated as closed on 04 November 2022;
- A public protection complaint that was responded to on 10 January 2023 was stated as closed on 05 January 2023;
- A public protection complaint that was responded to on 08 September 2022 was stated as closed on 31 August 2022, and
- A public protection complaint responded to on 11 July 2022 was stated as closed on 08 July 2022.

When we raised this issue, we were advised by a member of the EPP team that this was due to human error.

We also noted that the EPP performance data for the three quarters of 2022-23 was as follows:

- Quarter 1: 50 complaints with 100% response in 20 working days;
- Quarter 2: 44 complaints with 100% response in 20 working days, and
- Quarter 3: 38 complaints with 100% response in 20 working days.

<p>However, within our sample of ten EPP complaints received between April and December 2022, we found two in which a late response was given. Therefore, the performance information may be inaccurate.</p> <p><b><u>Risk</u></b></p> <p>The wrong performance information may be sent out quarterly, which informs the proportion of complaints that have been responded to on time. Inaccurate recording may lead to inefficiencies when dealing with complaints which may bring reputational damage to the Council.</p>	
<p><b><u>Recommendation</u></b></p> <p>The Council should ensure that EPP complaints are recorded accurately on the complaint tracker. Team members should be reminded to close a complaint after the response is issued.</p> <p>Concerning performance information, the Council should consider re-evaluating the data for EPP complaints to ensure that there are not any inaccuracies.</p>	<p><b><u>Rating</u></b></p> <p style="text-align: center;"><b>Priority 2</b></p>
<p><b><u>Management Response and Accountable Manager</u></b></p> <p>Agree to this.</p> <p><u>Coordinator and Service Confirming Response Date:</u></p> <ul style="list-style-type: none"> <li>To ensure accuracy on the EPP complaints tracker the Complaints Coordinator and relevant service will ensure the correct response date is added to the tracker. When the original complaint is sent to the service, the coordinator will ask the service for a response and for the service to confirm the 'Response/Closed date' in the body of the email. This ensure the Service and Coordinator are in agreement with the correct date in the tracker.</li> </ul> <p><u>Quality check before quarterly report submitted:</u></p>	<p><b><u>Agreed timescale</u></b></p> <p>Immediate - by June 2023</p>

- Prior to the completion of the quarterly report, the Complaints Coordinator will sample check the complaints tracker with the service response to ensure the correct response date has been entered into the tracker. This sample check of 5% will then be reviewed by another member of the EPP team. This will be completed in advance of sending to the corporate complaints team. This will reduce inaccuracies on the response date.

Head of Performance Management & Business Support

#### 4. Neighbourhood Management Complaints Acknowledgment

##### Finding

From a sample of ten neighbourhood management complaints received between August 2022 and January 2023, we assessed whether they were acknowledged within three working days per the Council's Policy. We noted that the following six did not have an acknowledgement sent out:

- Waste complaint: received on 01 December 2022;
- Waste complaint: received on 25 January 2023;
- Waste complaint: received on 31 January 2023;
- Waste complaint: received on 13 August 2022;
- Waste complaint: received on 24 August 2022, and

- Drainage complaint: received on 25 November 2022.

Furthermore, we noted two instances in which an acknowledgement was sent but after the three working days timeframe:

- Waste complaint: received on 08 February 2023 and acknowledged on 21 February 2023, and
- Waste complaint: Received on 05 January 2023 and acknowledged on 27 February 2023. A reference for this was not stated on the log.

**Risk**

Neighbourhood Management Complaints do not follow the Council's Policy. Service users may not receive a satisfactory response within the allocated timeframes.

**Recommendation**

Neighbourhood Management Officers (NMO's) should be reminded of the Policy requirements for acknowledging complaints. Management should consider delivering training and/or implementing regular spot checks to assess whether acknowledgement notifications were sent within the agreed timescale.

**Rating**

Priority 2

**Management Response and Accountable Manager**

As well as the excellent corporate training offered by colleagues in corporate complaints, Neighbourhood Management (NM) have arranged for Neighbourhood Officers (NO's) to undertake a bespoke training session on 24/05/2023 titled 'How we manage complaints'.

This two hour in person session will be a refresher and update meeting to address how NM currently manage complaint, as well as discussing the audit recommendations.

It will be an opportunity to look at the current corporate policy, the difference between an enquiry and a complaint, NM's current process, how we respond to customers and how we record this.

We will also look at any specific issues that NOs may require assistance with, how we manage difficult enquiries and our escalation routes.

**Agreed timescale**

By end of June 2023

Senior Neighbourhood Officers have also been tasked with undertaking checks as recommended to ensure satisfactory responses have been sent, and the introduction of a 'final letter' from HOS will be introduced giving details of stage 2 LGO complaint route to the customer.

Head of Performance Management & Business Support

## 5. Recording and Acknowledging Corporate Complaints

### Finding

We selected a sample of 14 corporate complaints received between April and December 2022 to assess whether they were accurately recorded and acknowledged. We found that in 12 cases, all corporate complaints were recorded. However, in two instances, we noted that the complaint was recorded after the receiving date:

- Received on 15 August 2022 but is stated to have been received on 23 August 2022, and
- Received in the housing mailbox on 22 July 2022, however, the Complaints Team were only made aware of this complaint on 23 August 2022 by the Housing Team.

In both these cases, the Housing team did not notify the Corporate Complaints Team of the complaints on time.

Furthermore, we also found that two corporate complaints did not have an acknowledgement sent within three working days as per the Policy:

- We could not locate an acknowledgement for this. However, management advised us this was a longstanding complaint where the complainant directly contacted the Assistant Director regarding trees.
- This was received by the Corporate Complaints Team on 23 August 2022 but acknowledged on 06 September 2022.

### Risk

Complaints may not be recorded accurately on System A leading to responses sent out after the 20 working days a service user has submitted a complaint. This may lead to greater user dissatisfaction and complaints to the Local Government Ombudsman. This could increase the risk of reputational damage to the Council.

<p><b><u>Recommendation</u></b></p> <p>The Council should consider adding a task or system prompt on System A, to ensure that acknowledgements are tracked for corporate complaints. Management should consider implementing spot checks to identify cases that were not acknowledged on time.</p>	<p><b><u>Rating</u></b></p> <p style="text-align: center;"><b>Priority 2</b></p>
<p><b><u>Management Response and Accountable Manager</u></b></p> <p>Management will implement an electronic task on System A to monitor the timeliness of acknowledgements, by the end of July 2023.</p> <p>Head of Customer Engagement &amp; Complaints</p>	<p><b><u>Agreed timescale</u></b></p> <p>By end of July 2023</p>
<p><b>6. Environmental and Public Protection and Neighbourhood Management Complaint Responses</b></p>	
<p><b><u>Finding</u></b></p> <p>We assessed a sample of ten EPP complaints received between April and December 2022 to assess whether they were responded to in allocated timeframes. We found that two were not responded to within the 20 working days, as stated in the CCP:</p> <ul style="list-style-type: none"> <li>• A public protection complaint due on 07 November 2022 was responded to on 10 November 2022. No holding letter was given to the complainant per page 11 of the Policy, and</li> <li>• A further public protection complaint was due for a response on 31 August 2022. However, it was responded to seven working days late on 08 September 2022. As mentioned above, no holding letter was given to the complainant informing them of the lateness.</li> </ul> <p>Moreover, in one response relating to a case regarding CCTV footage, the response letter read “Letter Head Template Response”, which may not look adequate to the complainant.</p>	



We also noted that in one case, which related to a physical letter being sent out regarding a parking complaint raised on 21 November 2022, there was no signposting to stage two of the complaint, which is the Ombudsman.

Similarly, from the neighbourhood management sample of ten, we noted that two were not responded to within 20 working days:

- Waste Complaint: Received on 01 December 2022 but not formally responded to until 23 February 2023, and
- Waste Complaint: This was received on 25 January 2023 but not formally responded to until 21 February 2023

The Head of Neighbourhood Management advised us that Neighbourhood Management complaints on some occasions may be handled via phone call or a site visit. Therefore, there may not be any formal written response. Thus, none of the Neighbourhood Management complaints had signposting to stage two of the complaints process if the complainant was not satisfied with the Council’s response.

**Risk**

Responses to complainants may be late, leading to further complaints and potential escalation to the Ombudsman. Complainants unsatisfied with the Council’s response may not know how to escalate to stage 2.

<p><b><u>Recommendation</u></b></p> <p>The Council should ensure staff members are given further training on monitoring and responding to complaints. The Council should ensure that EPP and Neighbourhood Management complaints are monitored so that timely responses can be given.</p>	<p><b><u>Rating</u></b></p> <p style="text-align: center;"><b>Priority 2</b></p>
<p><b><u>Management Response and Accountable Manager</u></b></p> <p>Agree to this.</p> <p>Monthly:              Complaints Coordinator to produce the complaints tracker to management with all overdue and outstanding cases highlighted. This will then be escalated to management and Assistant Directors for each service.</p>	<p><b><u>Agreed timescale</u></b></p> <p>June 2023.</p>

Training:

The Performance Management team will encourage staff to attend the corporate complaints training session.

Departmental Management Team:

Review of outstanding Complaints to ensure services are completing on time.

Head of Performance Management & Business Support

## 7. Corporate Complaints and Ombudsman Responses

### Finding

From a sample of 14 corporate complaints, we assessed whether they were responded to within defined timescales. We found that the following six were not responded to within the 20 working day timeframe stated on the Policy:

- Received on 03 November 2022, and the response was one working day late. Reminders to the service area were sent on this occasion;
- Received on 21 December 2022 and responded to on 10 February 2023;
- Received on 23 August 2022 and responded to on 21 September 2022;
- Received on 24 November 2022 and responded to on 28 December 2022;
- Received on 25 July 2022 and responded to on 23 August 2022. This was one working day late, and
- Received on 19 December 2022; the response was due on 20 January 2023. However, a holding reply was sent on 23 January 2023, after the response was due.

Furthermore, concerning Corporate Complaints, we found in the following two cases that there was no signposting to stage 2 of the complaints stage to the Ombudsman:

- This complaint was dealt with by Contractor A and included a refund. However, although a refund was issued, there was no signposting to stage 2.

- This complaint was dealt with directly by the care provider without the Bromley letterhead, thus, there was no signposting. The Officer explained to the individual that they should ensure that responses are sent from the corporate complaints mailbox in the future. Lastly, we assessed whether these cases were handled effectively from a sample of nine cases with an Ombudsman reference. We found that in one case, the complaint was still outstanding:
- This complaint was received on 19 October 2022, the first part of the response was not given until 16 November 2022, and the second part is still outstanding as of 23 February 2023. The Head of Customer Engagement advised us that this was due to the relevant Officer being unavailable. Due to this, it was challenging to respond to the complaint, leading to late responses. After the first response was issued, there was a query from the Ombudsman on 04 January 2023 and a further reminder on 16 January 2023 to respond to their queries. This was responded to on 24 January 2023, and we confirmed that the Head of Service did chase colleagues to garner a response.

**Risk**

Complaints may not be handled as per the CCP, and service users may not receive the level of service from complaints that they expect.

Stage 2 escalations could be made when no contact is made via holding letters to complainants.

**Recommendation**

The Council should ensure that staff are reminded of their obligations to send out holding replies when they expect a complaint to be late.

Management should remind staff of the importance of responding to complaints within the 20 working day timeframe stated on the Policy.

The service area should ensure that signposting to stage 2 of the complaints stage to the Ombudsman is included in all relevant cases.

**Rating**

Priority 2

<p><b><u>Management Response and Accountable Manager</u></b></p> <p>The importance of a timely complaint response is emphasised across the Council on a regular basis at all levels. Corporate Complaints pending are circulated weekly to all relevant Managers. A general reminder of the Complaints policy expectations will be sent out to all Managers by the end of June 2023.</p> <p>Head of Customer Engagement &amp; Complaints</p>	<p><b><u>Agreed timescale</u></b></p> <p>End of June 2023</p>
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### Assurance Level

Assurance Level	Definition
<b>Substantial Assurance</b>	There is a sound system of control in place to achieve the service or system objectives. Risks are being managed effectively and any issues identified are minor in nature.
<b>Reasonable Assurance</b>	There is generally a sound system of control in place but there are weaknesses which put some of the service or system objectives at risk. Management attention is required.
<b>Limited Assurance</b>	There are significant control weaknesses which put the service or system objectives at risk. If unresolved these may result in error, abuse, loss or reputational damage and therefore require urgent management attention.
<b>No Assurance</b>	There are major weaknesses in the control environment. The service or system is exposed to the risk of significant error, abuse, loss or reputational damage. Immediate action must be taken by management to resolve the issues identified.

### Recommendation ratings

Risk rating	Definition
<b>Priority 1</b>	A high priority finding which indicates a fundamental weakness or failure in control which could lead to service or system objectives not being achieved. The Council is exposed to significant risk and management should address the recommendation urgently.
<b>Priority 2</b>	A medium priority finding which indicates a weakness in control that could lead to service or system objectives not being achieved. Timely management action is required to address the recommendation and mitigate the risk.
<b>Priority 3</b>	A low priority finding which has identified that the efficiency or effectiveness of the control environment could be improved. Management action is suggested to enhance existing controls.