

FINANCE AND CORPORATE AFFAIRS COMMITTEE

8 SEPTEMBER 2025



Subject: CORPORATE COMPLAINTS MONITORING
REPORT FOR 2024/25 AND NEW CUSTOMER
FEEDBACK AND COMPLAINTS POLICY

Report of: Monitoring Officer

Decision Type: Key - CE98/25

1. COUNCIL PLAN PRIORITY

Hartlepool will be a place:

- with a Council that is ambitious, fit for purpose and reflects the diversity of its community. (Organisation)

2. PURPOSE OF REPORT

- 2.1 The purpose of this report is to inform Finance and Corporate Affairs Committee of the 2024/25 outturn position in relation to corporate complaints and those considered by the Local Government and Social Care Ombudsman (LGSCO). The Committee is also requested to agree an updated Customer Feedback and Complaints Policy for implementation from 1st April 2026.

3. BACKGROUND

- 3.1 Within the current Corporate Complaints, Comments and Compliments Policy there is a requirement to provide an annual report to elected members detailing the number of corporate complaints received by the Council along with the outcome of those complaints. The annual report is also used to share the information contained within the Local Government and Adult Social Care Ombudsman's (LGSCO) annual letter to the Council which details the complaints received and investigated by them. By doing this we fulfil the LGSCO expectation that their Annual Letter be reported to elected members in a timely manner.

- 3.2 On 1st April 2025 the LGSCO introduced a new Complaints Handling Code across their own caseload, and this has also been piloted by several local authorities. Although not statutory, there is an expectation that all local authorities will follow the Code from 1st April 2026 and the LGSCO will be assessing our approach to complaint handling against this code in their annual letters from next year. The Code covers complaints that fall under our Corporate Complaints Procedure and will not apply to areas where there is already a statutory complaints process in place, specifically complaints related to Children’s Social Care, Adult Social Care, Housing Management Service and Public Health.
- 3.3 The Code puts complaint handling at the heart of corporate governance within the Council and requires the regular reporting of performance to allow for effective scrutiny of service delivery. The LGSCO states that there should be a mechanism for centrally recording and reporting complaints, outcomes and service improvements.
- 3.4 The Code places responsibility on councils to put things right as soon as possible without the public having to escalate their concerns to the Ombudsman. The LGSCO believes that there should be a single model of complaint handling which makes it easier for local people to hold their local authority to account.

4. SUMMARY OF PROGRESS – CORPORATE COMPLAINTS 2024/25

- 4.1 During 2024/25 the number of corporate complaints remained the same as the previous year however, the proportion that were upheld increased to 47%.

Year	Number of complaints	Number upheld or partially upheld	Percentage upheld or partially upheld
2024/25	15	7	47%
2023/24	15	5	33%
2022/23	9	3	33%
2021/22	12	4	33%

- 4.2 **Tables 1, 2 and 3 in Appendix 1** set out further information on the corporate complaints received during 2024/25 and includes details of the upheld complaints.

5. LOCAL GOVERNMENT AND SOCIAL CARE OMBUDSMAN (LGSCO) – ANNUAL REVIEW LETTER 2025

5.1 The LGSCO Annual Review 2025 Letter, received 21st May 2025 sets out the annual statistics on complaints made to the LGSCO about Hartlepool Borough Council (HBC) for the year ending 31st March 2025. The data shows both the complaints and the enquiries that the LGSCO has recorded along with any decisions they have made.

5.2 In summary:

- In 2024/25 the LGSCO received 27 complaints or enquiries about HBC, which is an increase of 6 on the previous year.
- The LGSCO made decisions on 26 of these complaints or enquiries during 2024/25 and the outcomes were:

Decision	Number
Referred back for local resolution	5
Closed after initial enquiries	17
Detailed investigation - Not upheld	2
Detailed investigation - Upheld	2
Total	26

Please note the number of complaint enquiries the LGSCO received during the year does not always match the number of decisions made as not all complaints investigations were completed within the same year.

- The data shows that four of the complaints received by the LGSCO were investigated and of those, two were upheld. Therefore, the upheld rate is 50%. This is lower than the 100% upheld rate in 2023/24 and lower than the average upheld rate for LGSCO complaints investigated across similar authorities which is 80%. However, our numbers are very small, and this can skew the percentage figure significantly.
- When calculated as a rate of upheld decisions per 100,000 residents our rate is 2.1. The average for similar authorities is 5.3 upheld decisions per 100,000 residents.
- Further detail on the 2 complaints upheld is provided in **Table 4 in Appendix 1**.

- There have been 8 complaints upheld in the last 5 years out of a total number of 105 complaints received by the LGSCO. This represents an upheld rate of 8% of the total number received by the LGSCO over the 5-year period. Of the 17 complaints that went on to be investigated by the LGSCO over the past 5 years the upheld rate is 47%. Further details are provided in **Appendix 1 Table 5 and Table 6**.
- **Table 7 in Appendix 1** shows how Hartlepool compares favourably with the other 11 North East Local Authorities with the 2nd lowest upheld rate in the region. Hartlepool was also 2nd highest for the percentage of upheld cases where a satisfactory remedy was provided before the complaint reached the Ombudsman.

5.3 Once a corporate complaint investigation has been completed the complainant is advised of their right to approach the LGSCO. The fact that only a few complainants choose to do so provides reassurance that our approach to corporate complaints is robust.

6. LOCAL GOVERNMENT AND SOCIAL CARE OMBUDSMAN COMPLAINT HANDLING CODE AND REVIEW OF THE COUNCIL'S COMPLAINTS POLICY

6.1 In light of the LGSCO's new Complaints Handling Code being introduced, the existing Corporate Complaints, Comments and Compliments Policy (July 2021) has been reviewed to ensure compliance with the Code. Attached as **appendix 2** is the proposed updated and renamed Customer Feedback and Complaints Policy. A fresh, new approach has been taken to the format of the Policy to ensure that it is customer friendly and accessible online as well as in a PDF document.

6.2 The main changes to the policy are:

- **A focus on Early Resolution** – The policy emphasises the need for services to try and resolve any areas of dissatisfaction as a service request at the earliest opportunity to prevent it escalating to a formal complaint investigation.
- **Changes to response timescales** – In order to comply with the LGSCO Complaint Handling Code the response times at both stages 1 and 2 need to change. Stage 1, the formal response from the service, should be completed providing an explanation, apology and/or resolution where appropriate within **10 working days**. Stage 2, the review of the first

stage by an appropriate officer, should be completed within **20 working days**.

- **Introduction of an annual self-assessment** - The Code requires the Council to complete an annual self-assessment that will be reported alongside the Annual Complaints Report for scrutiny and challenge. This will be brought to this Committee each Autumn.
- **Introduction of a Member Responsible for Complaints** – The Code requires that an elected member be identified as the Member Responsible for Complaints. It is proposed that the Chair of this Committee be given the role as it is this Committee that is responsible for overseeing corporate complaints.

6.3 Although the Committee is asked to agree the new policy now it will not be implemented until 1st April 2026. This is to allow time to introduce new procedures and ensure staff are fully trained and ready to deliver the new approach. It will also allow time for the promotion of the new approach to residents and elected members.

7. OTHER CONSIDERATIONS/IMPLICATIONS

RISK IMPLICATIONS	<p>Poor complaint handling provides risks to the organisation around reduced customer satisfaction, reputational damage and the potential of an adverse report from the LGSCO.</p> <p>If the LGSCO Complaints Handling Code is not adhered to the Council could be at risk of an adverse report from the LGSCO.</p>
FINANCIAL CONSIDERATIONS	No relevant issues.
SUBSIDY CONTROL	No relevant issues.
LEGAL CONSIDERATIONS	We have a statutory duty to co-operate with the LGSCO during complaint investigations.
SINGLE IMPACT ASSESSMENT	The Single Impact Assessment included as Appendix 3 identifies no impact for any of the protected characteristics as the Customer Feedback and Complaints Policy will be available for all residents. However, there is an expectation

	<p>in the new Code that organisations should collect data on the protected characteristics of complainants at the first point they raise a complaint. This data should only be made available for statistical analysis so that we can assess whether our complaint system is equitable and fair and whether it disproportionately affects different groups. We will look to introduce this into our complaint intake processes from 1st April 2026 and the analysis of this data will inform the preparation of our Annual Report in future years. This data will also be used to inform future reviews of the Feedback and Complaints Policy and related internal procedures.</p> <p>Equality, Diversity and Inclusion requirements will be considered in the delivery of the Policy and in the preparation of the supporting procedures, officer guidance notes, officer training and letter templates.</p>
STAFF CONSIDERATIONS	No relevant issues
ASSET MANAGEMENT CONSIDERATIONS	No relevant issues
ENVIRONMENT, SUSTAINABILITY AND CLIMATE CHANGE CONSIDERATIONS	No relevant issues
CONSULTATION	No relevant issues

8. RECOMMENDATIONS

- 8.1 Finance and Corporate Affairs Committee are recommended to note the update on complaints received during 2024/25 and are requested to agree the new Customer Feedback and Complaints Policy for implementation from 1st April 2026.

9. REASONS FOR RECOMMENDATIONS

- 9.1 Finance and Corporate Affairs Committee have responsibility for the monitoring of the Corporate Complaints, Comments and Compliments Policy.

10. BACKGROUND PAPERS

10.1 Finance and Policy Committee 16th September 2024 - Corporate Complaints Monitoring Report for 2023/24.

11. CONTACT OFFICERS

Hayley Martin, Director of Legal, Governance and HR / Monitoring Officer
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 01429 284322

Sign Off:-

Managing Director	Date: 12 Aug 25
Director of Finance, IT and Digital	Date: 12 Aug 25
Director of Legal, Governance and HR	Date: 12 Aug 25

Complaints Summary 2024-25

Table 1: Corporate Complaints in 2024-25

	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total Number of Corporate Complaints	Number of Corporate Complaints Upheld
Total Number of Corporate Complaints	3	5	4	3	15	7
Finance, IT and Digital Services (FIT&DS) Department	0	2	1	0	3	1
Development, Neighbourhood and Regulatory Services (DN&RS) Department	1	0	2	2	5	3
Children's and Joint Commissioning Services (C&JCS) Department	1	1	1	1	4	1
Adult and Community Based Services (A&CBS) Department	1	1	0	0	2	2
Legal and HR (L&HR) Department	0	1	0	0	1	0

Table 2: Historical Comparison of Corporate Complaints

	2020/21		2021/22		2022/23		2023/24	
	Number of complaints	Upheld	Number of complaints	Upheld	Number of complaints	Upheld	Number of complaints	Upheld
Total Number of Corporate Complaints	25	11 (44%)	7	3 (43%)	12	4 (33%)	15	5 (33%)

Table 3: Details of Corporate Complaints Upheld in 2024-25

Dept.	Complaint Description	Outcome of complaint
DN&RS	Complaint about traffic issues resulting from the fireworks event.	The complaint was partly upheld, and the complainant received an apology for the fact that an event steward was not based on De Havilland Way in 2024. A full debrief will be conducted with all internal and external stakeholders to review future arrangements including traffic management and options for road closures. This review will hopefully result in developing best practices for all future events in Seaton Carew.
DN&RS	Complaint about various housing tenancy issues including information sent in a letter, conduct of officers and failure in communication	The complaint was partly upheld as the housing service team failed to clarify the support arrangements in place for the complainant leading to a misunderstanding between the complainant and the service. The complainant received an apology and notification that the service will now amend its suite of letters to include an option to request alternative meeting locations such as home visits where necessary. A review of training needs for staff with regards to working with vulnerable persons or individuals with special needs will also be undertaken.
DN&RS	Complaint about traffic issues resulting from the Fireworks event. (Please note that this complaint was from a different complainant to the one included above).	The complaint was partly upheld, and the complainant received an apology for the fact that an event steward was not based on De Havilland Way in 2024. A full debrief will be conducted with all internal and external stakeholders to review future arrangements including traffic management and options for road closures. This review will hopefully result in developing best practices for all future events in Seaton Carew.

Dept.	Complaint Description	Outcome of complaint
FIT&DS	Complaint about Council Tax issues including Single Person discount entitlement, transfer of direct debit arrangements and format and wording of correspondence.	The complaint was partly upheld as the transfer of direct debit agreements should not have been made without the complainant's agreement. An apology was issued to the complainant, and procedures have been amended to prevent this happening in the future
ACBS	Complaint about communication between an allotment holder and the allotment team.	The complaint was partly upheld. The investigation identified that a warning letter was issued correctly but that a Council Officer had used disrespectful language in a telephone conversation with the complainant. An apology was made to the allotment holder and staff training has taken place. Finally, it was confirmed that the Adult and Community Based Service meeting discussion about allotments was not one that tenants were able to participate in.
ACBS	Complaint that tenants from Rossmere Allotment were using a strip of land behind Clarkson Court to store items, disposal of materials and fly tip rubbish.	The complaint was partly upheld. The investigation could not prove that all the rubbish was from the allotment holders although there was photographic evidence that some of the rubbish was. The land is not owned by the Council and there was no proof that the allotment boundary fence had been removed by the tenants. The Allotment team has agreed to replace the boundary fence between the allotment and the strip of land. The investigation also recognised the time and trouble the complainant has taken over the past 3 years to bring this matter to the Council's attention and the distress due to this delay. The complaint was issued with a formal apology along with a time and trouble payment for the delay. The Council will also contact the landowner to discuss ongoing maintenance of this piece of land. Allotment holders have been reminded where the boundaries lie and that there is no access to this land and it should not be used as storage.

Dept.	Complaint Description	Outcome of complaint
CS&JC	Complaint about failure to facilitate Education, Health and Care Plan (EHCP) and lack of support.	The complaint was partly upheld. The investigation identified that a number of EHCP review meetings, draft EHCPs with changes and final EHCPs were not held / issued within the established timeframes. An apology was made to the student and their family for the delay in those relevant years. Since the investigation service improvements have been made with more capacity added to the Special Education Needs and Disabilities (SEND) Team. The complainant has escalated this to the Ombudsman and it is currently being investigated.

Table 4 – Outcome of LGSCO Complaints 2024-25

Reference	Description of complaint	Outcome	Date completed
Upheld (2 complaints)			
23 014 300	X complained about the Council’s failure to take ownership of land used as a car park under the terms of a legal agreement. X also complained that the evidence they had provided to the Council about anti-social behaviour had not been presented to members of a committee tasked with considering this issue.	The LGSCO found fault in the way the Council had acted but found no evidence to show the fault caused an injustice to X or to others. To avoid the recurrence of the fault we have reviewed our policy, practice and procedure relevant to section 106 agreements and future cost implications. Officers have been made aware of this review and its outcome, so they are aware for the production of any future section 106 agreements.	09/05/24
24 018 746	Miss X complained about a Council Officer’s conduct during a telephone call. She said she had received a warning letter for her own behaviour during the call, but the Council Officer had not faced any sanction. She also complained about the complaints handling. Miss X said she had lost trust in the Council. She wants an apology and compensation.	The LGSCO did not fully investigate this complaint as they felt that further investigation would not lead to a different outcome. In response to the Council’s complaint, we accepted that the Officer spoke inappropriately to Miss X during a telephone call and any action taken in respect of the Officer was a private matter between employer and employee. We did however send Miss X a written apology. The LGSCO said that the apology remedies any injustice caused and further investigation by themselves would not lead to a different outcome. During our investigation Miss X accepted she spoke with a raised voice in the call. It said she also spoke for a prolonged period in a critical manner. Due to this action we are satisfied it was appropriate to issue a warning letter to Ms X for her own conduct. This decision was made in line with our appropriate internal guidance. There is not enough evidence of fault to justify the LGSCO continued involvement.	21/11/24

Table 5: Historical Comparison of Complaints and Enquiries Received by LGSCO for the last 5 years – Hartlepool

	Adult Care Services	Benefits and Tax	Corporate and other services	Education and Children's Services	Environment Services	Highways and Transport	Housing	Planning and Development	Other	Total
2024/25	5	4	2	8	3	2	1	2	0	27
2023/24	2	0	1	9	1	4	1	3	0	21
2022/23	3	0	3	10	1	0	0	0	1	18
2021/22	5	1	3	6	1	1	1	2	0	20
2020/21	4	1	2	2	0	1	1	4	1	16

Table 6: Historical Comparison of Decisions Made by LGSCO for the last 5 years - Hartlepool

	Incomplete or Invalid	Advice Given	Referred back for Local Resolution	Closed after Initial Enquiries	Detailed Investigations/Outcome			Total	Average uphold rate (%) of similar authorities
					Not Upheld	Upheld	Uphold Rate		
2024/25	0	0	5	17	2	2	50%	26	80%
2023/24	0	0	6	11	0	2	100%	19	79%
2022/23	1	1	5	10	2	0	0%	19	72%
2021/22	0	0	5	15	4	1	20%	25	64%
2020/21	1	0	7	4	1	3	75%	16	N/A
5 YEAR TOTAL	2	1	28	57	9	8	47%	105	N/A

Table 7 - North East Local Authorities – 2024/25 LGCSO comparison

	Number of detailed investigations	Complaints Upheld		Upheld cases where the authority provided a satisfactory remedy before the complaint reached the Ombudsman (%)	Cases we were satisfied the authority successfully implemented our recommendations to remedy the complaint (compliance rate) (%)	Number of upheld decisions per 100,000 residents
		Number	Percentage	Percentage	Percentage	
Hartlepool	4	2	50%	50%	100%	2.1
Durham	16	11	69%	18%	100%	2.1
Northumberland	18	15	83%	0%	100%	4.6
Newcastle	11	7	64%	29%	100%	2.2
Sunderland	9	6	67%	17%	100%	2.1
Gateshead	7	6	86%	33%	100%	3.0
South Tyneside	11	4	36%	25%	100%	2.7
North Tyneside	10	8	80%	25%	100%	3.8
Darlington	6	6	100%	33%	100%	5.4
Stockton	8	8	100%	38%	100%	4.0
Middlesbrough	6	6	100%	17%	100%	3.9
Redcar & Cleveland	5	3	60%	67%	100%	2.2

Customer Feedback and Complaints Policy

Introduction

Hartlepool Borough Council aims to provide high quality services that meet the needs of local people. To support this aim the Council welcomes all customer feedback.

This policy sets out how feedback and complaints can be submitted and outlines the support that is available to a complainant when making a complaint.

Customer feedback

The Council welcomes feedback and wants to learn from both good and bad experiences. This will help improve services we offer across the Council. If your feedback is specifically about an officer of the Council, it will be shared with the individual and their manager. The service may wish to contact you to discuss your comments further, but this may not always be the case.

Regular updates on customer feedback are provided to senior officers and Councillors to ensure that what we are learning drives improvements in our services.

Complaints

The Council recognises complaints as a way to understand concerns from members of the public about the services it delivers. Complaints help the Council to put things right, improve service delivery and ensure that members of the public are satisfied with the Council and the services it provides.

Complaint process – trying to resolve the issues quickly

Effective complaint handling enables individuals to be heard and understood. The starting point for this is a service request. In most cases the Council should be able to put things right through normal service delivery processes and respond to expressions of dissatisfaction at the earliest opportunity. Early resolution through a service request is an opportunity for the Council to put things right quickly before it becomes a complaint.

A service request is defined as:

“a request that the Council provides or improves a service, fixes a problem or reconsiders a decision”.

Service requests are not complaints but may contain expressions of dissatisfaction. The Council should have the opportunity to deal with a service request, within a reasonable timescale, before it becomes a complaint. A complaint may be raised if you are unhappy with the response to your service request, even if the handling of the service request remains ongoing. We will not stop our efforts to address the service request if a complaint is made.

What is defined as a complaint?

The Council uses the Local Government and Social Care Ombudsman definition of a complaint

‘An expression of dissatisfaction, however made, about the standard of service, action or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual or group of individuals.’

The Council has a number of complaint procedures including this Customer Feedback and Complaints Policy. We will confirm which is the most appropriate for your complaint and let you know. The Council expects any complaints to be made within 12 months after the date of the issue or the date when you became aware of the issue. In some circumstances we might extend this time limit.

Stage 1

The Council aims to resolve most Stage 1 complaints promptly with an explanation, apology or resolution provided to the complainant where appropriate. Complaints will be acknowledged and logged at Stage 1 of the complaint's procedure **within 5 working days of the complaint being received.**

The Council aims to provide a full response to Stage 1 complaints **within 10 working days** of the complaint being acknowledged.

Should this timescale need extending due to the complexity of the case, or for another reason, the Council will inform you of the expected timescale of the response. The Council aims for any extension to be no more than 10 working days without good reason, and the reason(s) for the extension will be clearly explained to you.

The complaint response will address all points raised in the complaint and provide clear reasons for any decisions along with any appropriate recommended remedies. If any points of your complaint cannot be considered under this Complaint Policy, then they will be identified and where possible the appropriate route for your complaint to be taken will be explained.

The response will also provide details on how to request that your complaint is considered at Stage 2 of the Council's procedure, should you remain dissatisfied.

If you raise additional points of complaint whilst your complaint is being considered at Stage 1 then will be incorporated into the Stage 1 response. However, if you raise additional points after you receive your Stage 1 complaint response these may need to be considered as a new complaint.

Stage 2

You may request for your complaint to be considered at Stage 2 if all or part of the complaint is not resolved to your satisfaction. We expect that you will raise a stage 2 complaint within 20 working days of receiving the outcome of your Stage One investigation. There may be circumstances when this timescale could be extended, in this event it will be discussed with the complainant.

An acknowledgment of your request for Stage 2 will be sent within **5 working days** of the request being received. The acknowledgement will provide a summary of the Council's understanding of any outstanding issues and the outcomes that you are seeking along with an expected response date. If your complaint is not appropriate for review at Stage 2, you will be informed of the reasons why and your options for next steps.

A review of your complaint will be undertaken by an appropriate officer of the Council, but this will not be the same person who considered your complaint at Stage 1. We aim to issue a response within **20 working days** of the complaint being acknowledged.

Stage 2 will involve a review of the response which was provided at Stage 1 to ensure that the response was accurate, thoroughly investigated and opportunities to resolve the matter have been adequately considered. Should the timescale need extending due to the complexity of the case, or for another reason, the Council will inform you of the expected timescale of the response. The Council aims for any extension to be no more than 20 working days without good reason, and the reason(s) for the extension will be clearly explained to you.

The Stage 2 response will be the Council's final response to your complaint and will confirm the following in writing to the complainant:

- the complaint stage;
- the Council's understanding of the complaint;
- the decision on the complaint;
- the reasons for any decisions made;
- the details of any remedy offered to put things right;
- details of any outstanding actions; and
- details of how to escalate the matter to the Local Government and Social Care Ombudsman if the complainant remains dissatisfied.

Local Government and Social Care Ombudsman

If you have been through all stages of the Council's complaints process and you still remain dissatisfied, you can ask the Local Government and Social Care Ombudsman to consider your complaint. You can find more information about this on the [Local Government and Social Care Ombudsman's website](#).

The Ombudsman investigates complaints in a fair and independent way - it does not take sides. It is a free service.

The Ombudsman expects you to have given the Council a chance to deal with your complaint, before you contact them.

About the Ombudsman

The Local Government and Social Care Ombudsman looks at individual complaints about councils and some other organisations providing local public services. It also investigates complaints about all adult social care providers (including care homes and home care agencies) for people who self-fund their care. There are some [limits on what the Ombudsman can look at](#). For example, the Ombudsman may not consider your complaint if you have not been significantly personally affected by the issue you are raising, or if you have a right of appeal to a court or tribunal.

Contact

Website: www.lgo.org.uk

Telephone: 0300 061 0614

What do you need to provide to make a complaint?

Complaints can be made by email, over the telephone, by letter, face to face or online. Whatever way you make a complaint; the Council will ask you to provide:

- name and contact details (unless submitting an anonymous complaint).
- details of your complaint - it is useful for you to provide dates and times where relevant to assist with an investigation and any evidence you wish to be considered.
- a desired outcome. This will help the Council understand what you would like to happen as a result of submitting your complaint. The Council will try to meet desired outcomes however it is not always possible to do so. Should this be the case, an explanation will be provided.
- consent (where appropriate). If someone else is acting on your behalf to submit a complaint (e.g. an advocate or family member), the Council will require your consent in writing or documentation providing the relevant legal powers for them to do so (e.g. Power of Attorney).

Contact Details:

To provide feedback or make a complaint, please use the contact details below.

Online

You can submit feedback or make a complaint using our online form [Customer Feedback and Complaints](#)

Email

Email your feedback or complaint to customer.comments@hartlepool.gov.uk

Phone

Call the Council Contact Centre on 01429 266522

Post

Write to us at:

Customer Feedback and Complaints

Civic Centre

Victoria Road

Hartlepool

TS24 8AY

Complaints about a contracted or commissioned service provided on behalf of the Council

If your complaint relates to a service which is delivered on behalf of the Council by a contractor or third-party provider the Council would welcome the opportunity for them to put it right in the first instance (Stage 1). You may then request for your complaint to be considered at Stage 2 if all or part of the complaint is not resolved to your satisfaction. Stage 2 complaints will be considered by the Council.

If you are unable to discuss the matter with the contractor, have not received a response from them or wish to have your complaint considered at Stage 2 you can contact us.

Support for complainants

The Council recognises that receiving appropriate support when making a complaint is important for some people. The nature of certain complaints may lead to some complainants feeling that they would like another person's support to guide them through the process or to represent them. The information below provides details on the support available when making a complaint.

Advocacy support and representation

If you want to share your views with the Council about a service we provide, but need some support to do this, you can ask someone to act as your 'advocate'. An advocate is someone who can support you to express your views and wishes to help you to raise a concern or make a complaint. They can contact the Council on your behalf if you agree to them doing so. The Council will only discuss your concerns with an advocate after you have given your consent for us to do so. To allow someone to act on your behalf please complete the relevant consent form.

An advocates' role is to listen to your views and concerns and help you to explore your options. They can provide information to help you make an informed decision, accompany you to meetings and contact us on your behalf. An advocate should not give their personal opinion, try to make decisions for you or make judgements about you.

Professional advocacy services can be accessed through some organisations and charities. Friends, family and carers can also act as an advocate.

Below are the details of some advocacy services that are available:

- the [Citizens Advice Bureau](#) who can provide advice and guidance in making a complaint.
- if you are a child or young person the [National Youth Advocacy Service](#) can provide individual advocacy and arrange of information, advice and support to ensure your voice is heard when decisions are being made about you.

Making a complaint on behalf of someone else

If you would like to make a complaint on someone else's behalf please be aware that before accepting the complaint the Council will need to confirm that you have the authority to do so. If the individual involved can make decisions in their own right, the Council will need to ensure that they have provided their consent for you to act on their behalf. This is because providing you with a response to their complaint may involve disclosing personal information and so the Council needs to ensure that their rights are protected. The Council will contact the individual to ask them to complete and sign a consent form. In circumstances where the individual does not have the capacity to complain in their own right, the Council will ask to be provided with relevant documentation to confirm that you have the relevant powers in place to act on their behalf. This may include documentation such as Power of Attorney. If we require such information we will contact you.

Members of Parliament (MPs) and Councillors

You may ask a Member of Parliament (MP) or a local Councillor for support in making a complaint. MPs or local Councillors who state that they are acting on behalf of the complainant will be assumed to have consent to do so. This is because the Council does not generally have to get the express consent of an individual to disclose personal information to an elected member as defined by Schedule 1, Part 2, paragraph 23(3) of the Data Protection Act.

Accessibility and additional languages

The Council wants all its customers to feel that they are able to send their feedback and/or complaints for consideration. If you have any additional needs not covered on this webpage please contact customer.comments@hartlepool.gov.uk

Expectations of complainant behaviour

The Council appreciates that complaints are sensitive in nature and that complainants may feel passionate about their concerns. Council Officers should, at all times, treat you with respect as an individual, listen to your concerns, providing you with the information as necessary.

The Council also expects complainants to behave in a respectful manner throughout the process. This involves not using unacceptable language, derogatory terms, being personal in nature or threatening, either verbally or in your correspondence to the Council. If complainants decide not to behave in a respectful manner, the Council will take appropriate action to support and protect its staff. We reserve the right to cancel any complaint that contains excessive foul and abusive language. The Council will consider the guidance and good practice advice provided by the Local Government and Social Care Ombudsman in dealing with these matters.

The Council has a [Managing Unreasonable Customer Behaviour Policy](#) that outlines the expectations of customers behaviour and what may be put in place to assist and protect all parties.

Other Information

Joint responses

If a complaint relates to more than one service area within the Council, a lead service will be agreed, and a coordinated response will be prepared. One response will be provided to your complaint. There is a joint protocol between local authorities and health partners with respect to dealing with complaints that cover both health and local authority joint service provision. This protocol will be used to determine how your complaint will be handled. You will be notified with a point of contact and an expected response date.

Collective complaints

Where appropriate, complaints made by a number of individuals on the same subject will be dealt with as one investigation. It may be appropriate for each complainant to receive a response directly unless a representative has been nominated on behalf of the group of individuals.

Withdrawing a complaint

You may withdraw your complaint at any time by contacting the Council. Consideration will be given as to whether the concerns raised still need to be fully investigated, for instance if there were safeguarding concerns relating to you or other individuals, or if there's a wider public interest. If you feel unable to continue with your complaint then you may withdraw it and raise it again when you feel able to do so. If you raise the complaint again in the future consideration will be made at that point as to whether it is still reasonable to accept the complaint.

Deceased individuals

In circumstances where the individual is deceased and you would like to make a complaint about the service they have received, the Council will require you to provide documentation to confirm that you have been granted the right to their personal information. Documentation may include Grant of Probate or a Letter of Administration. If you are unsure what documentation you need to provide, please contact the Council and you will be advised further.

Learning from feedback and complaints

Regular updates will be provided to the Executive Leadership Team and Councillors including the Annual Complaints report. This report will highlight the number and types of complaints we have had over the year including complaints that have been escalated to the Local Government and Social Care Ombudsman. The report will highlight any trends in complaints as well as recommendations that have been implemented during the year to improve services. The Annual Report will also report on the Self-Assessment in line with the Local Government and Social Care Ombudsman Complaints Handling Code. We have a named 'Member Responsible for Complaints', the Chair of Finance and Policy Committee, who is responsible for complaints and receives regular updates.

Exclusions and complaints not covered by this policy

There may be several reasons why the Council cannot accept your complaint, however each complaint will be considered on its own merit, and we will not take a blanket approach to excluding complaints. If the Council decides not to accept your complaint, we will clearly explain the reasons why and tell you of your other possible options. We will also inform you of your right to take our decision to the Local Government and Social Care Ombudsman.

Possible reason for exclusion

- **Service request**

Service requests will not be dealt with under this procedure. If received service requests will be directed to the relevant service area for consideration. An example of a service request is reporting a pothole or streetlight to be fixed or fly tipping to be cleared.

- **Concluded or complaints older than 12 months**

Complaints which have already been fully investigated by the Council and the Local Government and Social Care Ombudsman will not be dealt with under this procedure. Complaints made 12 months or more after the date of the issue or the date of the complainant becoming aware of the issue will not usually be investigated. In some circumstances this time limit may be extended.

- **Decision on Council Policy**

Complaints about the council's policies and about decisions made by elected members at council meetings do not fall within the remit of this procedure. However, complaints are sometimes made to officers about decisions made by the council and its decision-making bodies. These complaints will be recorded and forwarded to the relevant policy committee chair and the complainant informed that this has been done. A substantive response should then be made to the complainant by the relevant policy committee chair.

- **Interaction between the Code with other complaints processes**

The Customer Feedback and Complaints Policy does not cover complaints which are already covered by statutory processes set out in law or other guidance. For example, this may include Adult Social Care, Children's Social Care, Public Health and Housing Management. Where a complaint includes something that is covered by a statutory complaints process then the whole complaint will be dealt with under the statutory process, unless the points of complaint can be easily separated and responded to separately.

- **Schools and Academies**

Each school must have a procedure in place to deal with complaints. Complaints procedures may vary from school to school, but these should be made available upon request. The Council has no power to investigate a complaint about the internal management of a school. Further information on school complaints can be obtained from the Department for Education at www.gov.uk/complain-about-school

- **Data Breaches and FOI's**

Complaints regarding Data Protection will be dealt with under the Council's [Access to Information](#) page on our website. If you are unhappy with the response to your FOI, you can request an internal review and escalate to the [Information Commissioner's Office](#) (ICO) if you remain unhappy.

- **Legal proceedings**

If legal action is being taken either by yourself or by the Council, the Council may not deal with your complaint if it is considered that to do so would prejudice the conduct of those proceedings. There may also be circumstances where a complaint may need to be put on hold until after the legal proceedings have taken place. In either case, you will be informed of the Council's decision.

- **Existing appeals process**

The Council will not deal with complaints under this procedure regarding services where there are existing appeals processes. You will be advised of the relevant appeals process and given details of how to make an appeal. An example of this may be the school admissions panel who deal with matters of dissatisfaction regarding decisions on school placements.

- **Employee conduct or behaviour**

Complaints about members of staff either in isolation or as a wider complaint can be submitted by emailing: customer.comments@hartlepool.gov.uk. These will be investigated however, depending on the nature of the complaint about the member of staff, it may not be possible to share with you the full details of the investigation and outcome.

- **Elected Members**

Complaints about Councillors are reviewed under the Council's Code of Conduct for Members. More information can be found on the Council's website.

- **Complaints about others** e.g. utilities, other government bodies or private businesses. These complaints are not covered by this procedure and those companies or government departments should be approached directly to make a complaint.

- **Social Media**

The Council will not respond formally to complaints which have been uploaded to any social media platform. Please use the contact details outlined below to make a complaint.

- **Anonymous Complaints**

Anonymous complaints (i.e. where individuals do not provide their name or contact details) may be investigated. However, it will not be possible to provide a response. If an anonymous complaint does not provide enough information to enable the Council to investigate or to take further action, the Council will not investigate. Investigation may not be possible if the impact on the individual raising the complaint nor identify whether there are any conflicts of interest or other ongoing action such as appeals or court action etc. Anonymous noise complaints cannot be investigated.

- **Groups of people who may not raise a complaint**

For example, complaints made on behalf of another public body e.g. parish council, NHS Trust, government department. The complaints process is not an appropriate route to resolve disputes between public bodies. However, members of other public bodies may raise complaints in a personal capacity or on behalf of an individual or group of individuals.

For example, complaints from local Councillors or Members of Parliament (MPs) about issues of wider public interest. These are best addressed through local "member enquiry" processes.

- **Enforcement Conduct Board (EBC)**

Complaints regarding enforcement services may be more appropriately dealt with via the Enforcement Conduct Board. If you make a complaint regarding the actions of an enforcement service, the Council will advise what the most appropriate process is for you to follow.

Privacy Information and Data Protection

All personal information collected is for the purpose of responding to customer feedback and complaints. It will only be shared with relevant service areas of the Council or third parties where necessary and where the law enables the Council to

do so, for example, MPs or Councillors, or the Local Government and Social Care Ombudsman if they are investigating your complaint. For more information about how the Council processes your personal information visit [Access to Information](#)

We aim to collect data on the protected characteristics of complainants, but this will not be made available except for statistical analysis. You do not have to provide this information for your complaint to be considered. However, by analysing this data, we can assess whether our complaint systems are equitable and fair and whether it disproportionately affects different groups. This analysis will inform the preparation of our Annual Complaints Report.

Confidentiality

The Council considers the importance of confidentiality when handling customer feedback and complaints. However, to enable a complaint investigation to be undertaken, personal information will be shared with the investigating officer and on occasions other officers where necessary. Personal information will not be shared with anyone unnecessarily and will be handled in line with data protection legislation. If information is given to the Council in confidence, the information will not be disclosed without consent, unless the Council has a legitimate or legal reason to do so for example a safeguarding concern regarding a child or young person.

The Local Government Act 1974 gives the Ombudsman powers of the High Court to ask for evidence or witnesses without asking for consent from the complainant. So if the Ombudsman asks we will share all necessary information with them in relation to your complaint.

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Section 1 – Details of the proposed action being considered

1.1 Lead Department:	Legal, Governance and HR
1.2 Lead Division:	N/A

1.3 Title of the proposed action:
Customer Feedback and Complaints Policy

1.4 Brief description of the proposed action:
To review the Corporate Complaints, Comments and Compliments Policy and develop an updated Policy ensuring compliance with the Local Government and Social Care Ombudsman's (LGSCO) Complaint Handling Code.

1.5 Who else is involved:
Departmental Complaints Lead Officers and ELT.

1.6 Who will make the final decision about the proposed action:
Finance and Corporate Affairs Committee.

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1.7 Which wards will be affected by the proposed action? Tick all that apply					
All wards	<input checked="" type="checkbox"/>	Hart	<input type="checkbox"/>	Seaton	<input type="checkbox"/>
Burn Valley	<input type="checkbox"/>	Headland & Harbour	<input type="checkbox"/>	Throston	<input type="checkbox"/>
De Bruce	<input type="checkbox"/>	Manor House	<input type="checkbox"/>	Victoria	<input type="checkbox"/>
Fens & Greatham	<input type="checkbox"/>	Rossmere	<input type="checkbox"/>	N/A - Internal council activities	<input type="checkbox"/>
Foggy Furze	<input type="checkbox"/>	Rural West	<input type="checkbox"/>		

1.8 Completed By:		
Name	Job Title	Date Completed
Catherine Grimwood	Performance and Partnerships Manager	10.8.25

1.9 Version	Author	Summary of Changes	Date

Hartlepool Borough Council – Single Impact Assessment Form

Section 2 – Explaining the impact of the proposed action

2.1 What data and evidence has informed this impact assessment?

The LGSCO's Complaint Handling Code and the Council's existing Corporate Complaints Comments and Compliments Policy (July 2021).

The equality profile of Hartlepool residents from the Council's annual Equality, Diversity and Inclusion report.

2.2 If there are gaps in evidence or not enough information to assess the impact, how have you addressed this or how will you address it?

Gap(s) Identified	How it / they have or will be addressed
Data on the protected characteristics of complainants.	There is an expectation in the new Code that organisations should collect data on the protected characteristics of complainants at the first point they raise a complaint. This data should only be made available for statistical analysis so that we can assess whether our complaint system is equitable and fair and whether it disproportionately affects different groups. We will look to introduce this into our complaint intake processes from 1 st April 2026 and the analysis of this data will inform the preparation of our Annual Report in future years and future reviews of the Feedback and Complaints Policy and related internal procedures.

Hartlepool Borough Council – Single Impact Assessment Form

2.3 Risk Score

Impact	Negative Impact Score	Explanation – what is the impact?
Age		
✘ No Impact	N/A	# See note.
Disability		
✘ No Impact	N/A	# See note.
Gender Reassignment		
✘ No Impact	N/A	# See note.
Marriage and Civil Partnership		
✘ No Impact	N/A	# See note.
Pregnancy and Maternity		
✘ No Impact	N/A	# See note.
Race (Ethnicity)		
✘ No Impact	N/A	# See note.
Religion or Belief		
✘ No Impact	N/A	# See note.
Sex		
✘ No Impact	N/A	# See note.

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Impact	Negative Impact Score	Explanation – what is the impact?
Sexual Orientation		
✗ No Impact	N/A	# See note.
Care Leavers (Local)		
✗ No Impact	N/A	# See note.
Armed Forces (Local)		
✗ No Impact	N/A	# See note.
Poverty and Disadvantage (Local)		
✗ No Impact	N/A	# See note.

Note: The Customer Feedback and Complaints Policy will be available for all residents. Equality, Diversity and Inclusion requirements will be considered in the delivery of the Policy and in the preparation of the supporting procedures, officer guidance notes, officer training and letter templates etc.

Section 3 - Mitigation Action Plan or Justification

Group(s) impacted	Proposed mitigation	How this mitigation will make a difference	By when	Responsible Officer
N/A				

Justification If you need to justify your proposed action explain this here
N/A

Hartlepool Borough Council – Single Impact Assessment Form

Section 4 - Sign Off

Responsible Officer sign off:	
Name	Catherine Grimwood
Job title	Performance and Partnerships Manager
Assistant Director / Director sign off:	
Name	Hayley Martin
Job title	Director of Legal, Governance and HR