 <p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>	<p>WEST OXFORDSHIRE DISTRICT COUNCIL</p>
<p>Name and date of Committee</p>	<p>AUDIT AND GOVERNANCE COMMITTEE - 25 JUNE 2026</p>
<p>Subject</p>	<p>ANNUAL COMPLAINTS PERFORMANCE AND SERVICE IMPROVEMENT REPORT, INCLUDING THE ANNUAL SUMMARY OF COMPLAINTS STATISTICS FROM THE LOCAL GOVERNMENT AND SOCIAL CARE OMBUDSMAN – YEAR ENDING 31 MARCH 2026</p>
<p>Wards affected</p>	<p>All</p>
<p>Accountable member</p>	<p>Councillor Nigel Ridpath – Chair of Audit and Governance Committee Email: nigel.ridpath@westoxon.gov.uk</p>
<p>Accountable officer</p>	<p>Phil Martin, Chief Executive Email: phil.martin@westoxon.gov.uk</p>
<p>Report author</p>	<p>Cheryl Sloan, Executive Director, Workforce Strategy & Transformation Email: cheryl.sloan@publicagroup.uk</p>
<p>Summary/Purpose</p>	<p>This report provides a review of the organisation’s complaints handling performance and service improvement over the financial year 1 April 2025 – 31 March 2026.</p> <p>The report is written in line with the Councils Complaints Policy and Procedure (‘the Policy’) which was introduced on 1 April 2025. The Policy meets the requirements of the Local Government and Social Care Ombudsman’s Complaint Handling Code.</p> <p>The report also presents the Annual Complaints statistics as provided by the Local Government and Social Care Ombudsman (‘the LGO’) letter for the year 1 April 2025 – 31 March 2026.</p> <p>The report also outlines some proposed changes to the Policy for Committee Approval.</p>
<p>Annexes</p>	

	Annex A1, A2, A3 - The Local Government and Social Care Ombudsman's annual letter for 25/26. Annex B – The Complaints Policy and Procedure
Recommendation(s)	That the Audit and Governance Committee: <ul style="list-style-type: none"> 1. note the content of the report and the Local Government and Social Care Ombudsman's Annual Letter for 2025/26 attached at Annex A 2. approves the recommended changes to the Complaints Policy and Procedure in relation to the use and response to Artificial Intelligence generated complaints attached at Annex B.
Corporate priorities	All
Key Decision	No
Exempt	No
Consultees/ Consultation	N/A

1. BACKGROUND

- 1.1** In February 2024, the Local Government Ombudsman (LGO) introduced a new Complaint Handling Code ('the Code'). The purpose of the Code was to enable organisations to resolve complaints raised by individuals promptly, and to use the data and learning from complaints to drive service improvements. It also aimed to help create a positive complaint handling culture amongst employees and individuals.
- 1.2** Local councils were encouraged to adopt the Code as soon as they are able to do so, however, the LGO intended to start considering the Code as part of their processes from April 2026 to give local councils the opportunity to adopt the Code successfully into working practices.
- 1.3** In response to the new Code, West Oxfordshire District Council ('the Council'), reviewed its complaints processes and implemented a new complaints policy and procedure from 1 April 2025 which complied with the new Code. A copy of the Policy is attached in Annex B for reference. This was approved by this Committee at its meeting on 23 January 2025.
- 1.4** A requirement of the new Code is to produce an annual Complaints Performance and Service Improvement Report, which covers the following:
 - an annual self-assessment against the Code to ensure the Policy remains compliant with its requirements;
 - a qualitative and quantitative analysis of the Council's complaint handling performance, including a summary of complaints that were not accepted;
 - details of any findings of non-compliance with the Code;
 - the service improvements made as a result of learning from complaints;
 - the LGO's Annual Letter regarding the Council's performance; and
 - any other relevant reports or publications issued by the LGO relating to the Council.
- 1.5** This report is therefore our annual Complaints Performance and Service Improvement Report which covers the requirements set out in the Code and our revised Policy.
- 1.6** The report also includes a recommendation to make some changes to the Policy to address the use of Artificial Intelligence (AI) by complainants which is set out fully in Section 8.

2. SELF-ASSESSMENT AGAINST THE CODE

Below is our self-assessment against the Code:

Code section	Action	Do we follow the Code: Yes/No	Explanations and Commentary
1: Definition of a service request and complaint	We recognise the difference between a service request and a complaint, and these are defined in our Policy.	Yes	This is explained within our Policy, Point 4, complaints-policy-and-procedure-cdc.pdf .
2: Exclusions	Our Policy sets out circumstances where we would not consider a complaint. These are reasonable and do not deny individuals access to redress.	Yes	This is explained in paragraph 5.1 of the Policy complaints-policy-and-procedure-cdc.pdf If there is a circumstance where a complaint is received but it falls within one of the exclusion categories, the Council will always respond to the complainant and provide advice. An example would be with complaints regarding planning decisions, where we would redirect the complaint to the appeals process. If the complainant is dissatisfied with our response, they can still raise their complaint with the LGO.
3: Accessibility and awareness	We provide different channels through which individuals can make complaints. These are accessible and we can make reasonable adjustments where necessary	Yes	This is exemplified within paragraph 5 of the Policy complaints-policy-and-procedure-cdc.pdf The majority of complaints are received by email to customer feedback or through customer services.
4: Complaint handling resources	We have designated, sufficient resource assigned to take responsibility for complaint handling. Complaints are viewed as a core service and resourced accordingly.	Yes	The team who manage complaints is very lean and are also responsible for Freedom of Information requests. This is 1.5FTE across the partnership. We

			have recently increased resource by an additional 11 hours to meet increased demand across Complaints and FOIs.
5: The complaint handling process	We have a single Policy for dealing with complaints covered by the Code and individuals are given the option of raising a complaint where they express dissatisfaction that meets the definition of the complaint in our Policy.	Yes	We have a single corporate Policy in place. This has been communicated to all service areas, and detailed guidance is available on the portal, as well as through the complaints team. Where a complaint is received, service areas either pass it on internally in line with the Policy or, if the customer prefers, provide the contact details for the Customer Feedback team so the customer contact the complaints team directly.
6: Complaints stages (Stage 1)	We process stage 1 complaints in line with timescales and processes set out in the Code.	Yes	<p>Statistics provided within the report.</p> <p>Performance is reviewed on a quarterly basis and reported to the Senior Leadership Teams '(SLT)' and Executive as part of the performance report.</p> <p>This financial year, two complaints did not hit the 10-day target, and the extension was not utilised. 97% were within target.</p>
6: Complaints stages (Stage 2)	We process stage 2 complaints in line with timescales and processes set out in the Code.	Yes	<p>Statistics provided below</p> <p>Performance is reviewed on a quarterly basis and</p>

			reported to SLT and Executive as part of the quarterly performance report. 100% of stage 2 complaints were within target.
7: Putting things right	When something has gone wrong, we take action to put things right.	Yes	When a complaint is upheld, we take action to address the problem, learn from what happened, apologise and improve future practice.
8: Performance reporting and self-assessment	We produce an annual complaints performance and service improvement report for scrutiny and challenge which includes a self-assessment against the Code.	Yes	Quarterly performance reports are created and reported to SLT and Executive.
9: Scrutiny & Oversight	We have appropriate senior leadership and governance oversight of the complaints process and performance.	Yes	The Chief Executive has overall responsibility for complaint handling in consultation with the Chair of Audit and Governance Committee.

3. QUALITATIVE AND QUANTITATIVE ANALYSIS OF THE ORGANISATION'S COMPLAINT HANDLING PERFORMANCE, INCLUDING A SUMMARY OF COMPLAINTS THAT WERE NOT ACCEPTED

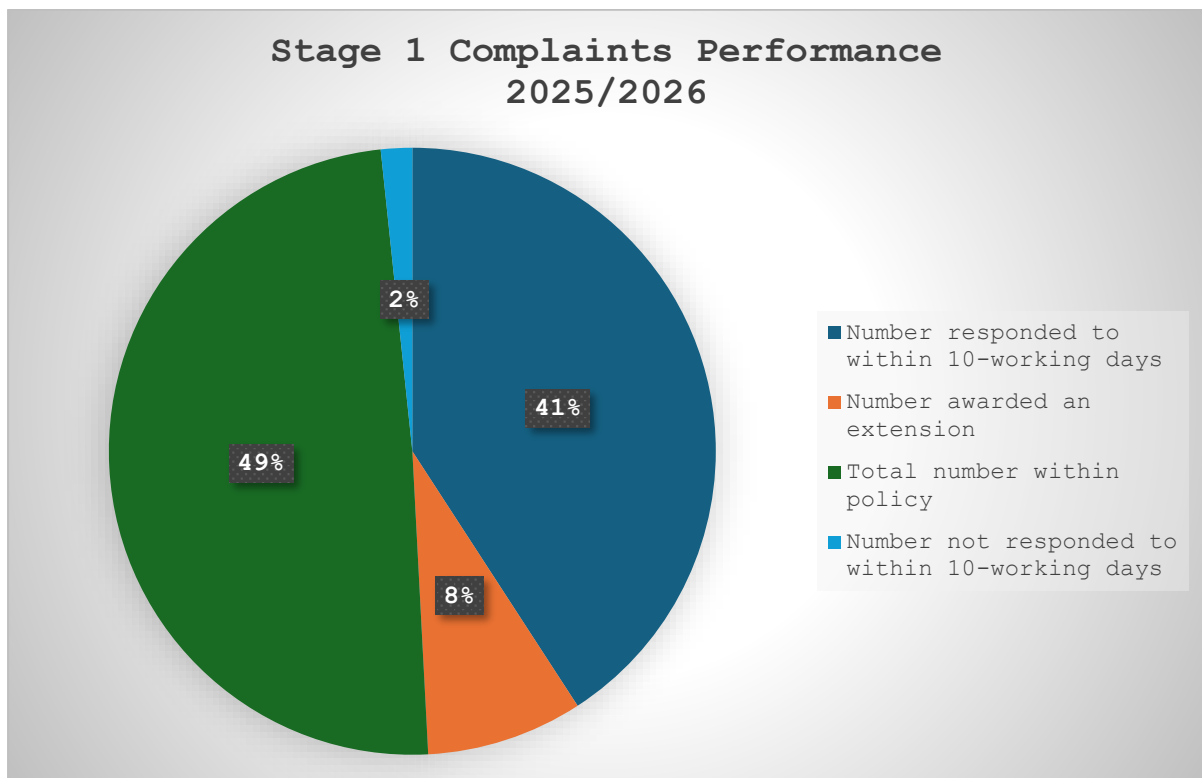
3.1 A complaint is defined by the Council's Policy as an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the Council, its own employees, or those acting on its behalf, affecting an individual or group of individuals. This differs from a service request, which is a direct request for the Council to take action to resolve an issue and is not included within the complaint's statistics.

3.2 Target response times for customer complaints, as set by the LGO are as follows:

- Stage 1 – 10-working days, plus an extension of a further 10-working days for complex complaints
- Stage 2 – 20-working days, plus an extension of a further 20-working days for complex complaints.

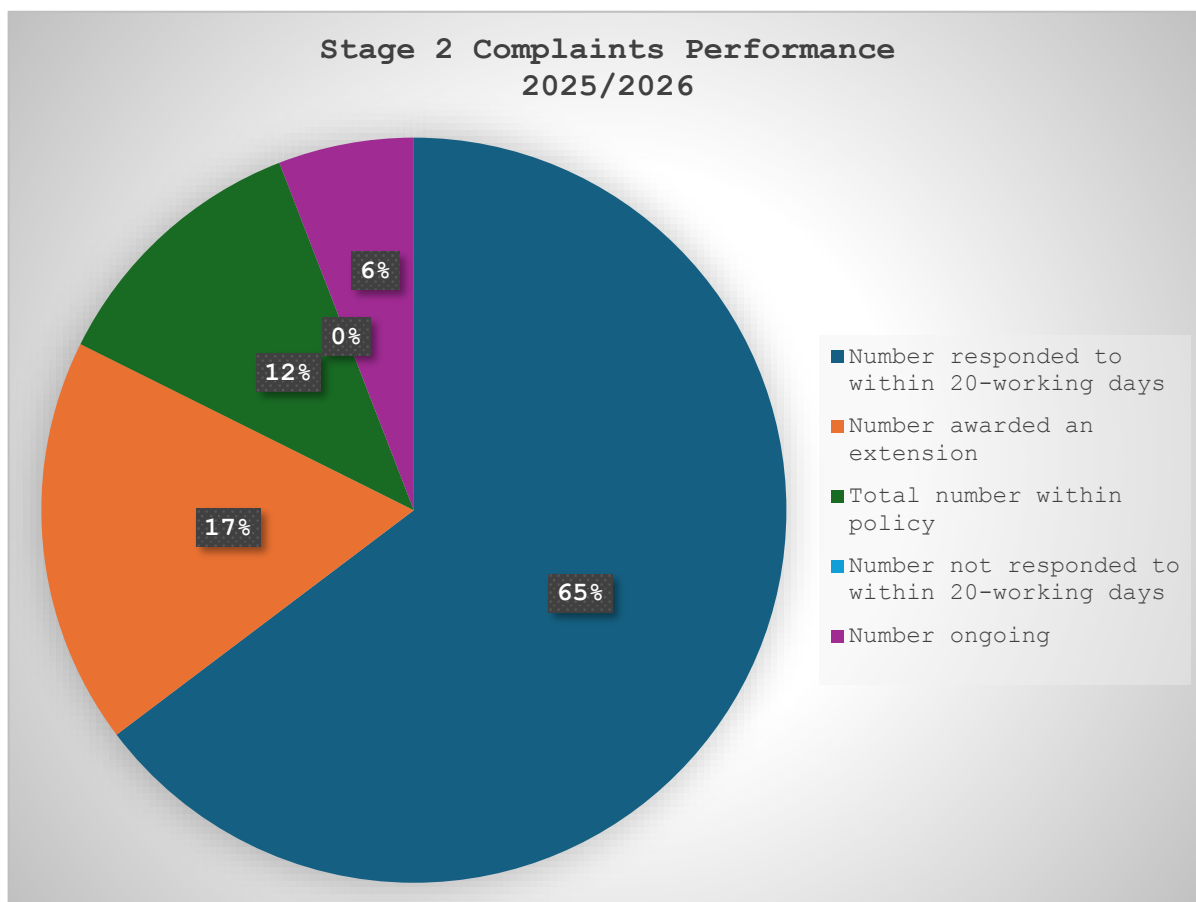
3.3 Below is a summary of the stage I complaints received about services provided by the Council during the financial year 1 April 2025 – 31 March 2026 along with the percentage which were responded within target shown in a table and graph format.

Stage I	Q1	Q2	Q3	Q4	Total	%
Number responded to within 10 working days	6	13	15	15	49	80.0%
Number awarded an extension	3	4	2	1	10	16.6%
Total within Policy					59	97%
Not responded to within 10 working days	1	0	1	0	2	3.3%
Totals	10	17	18	16	61	



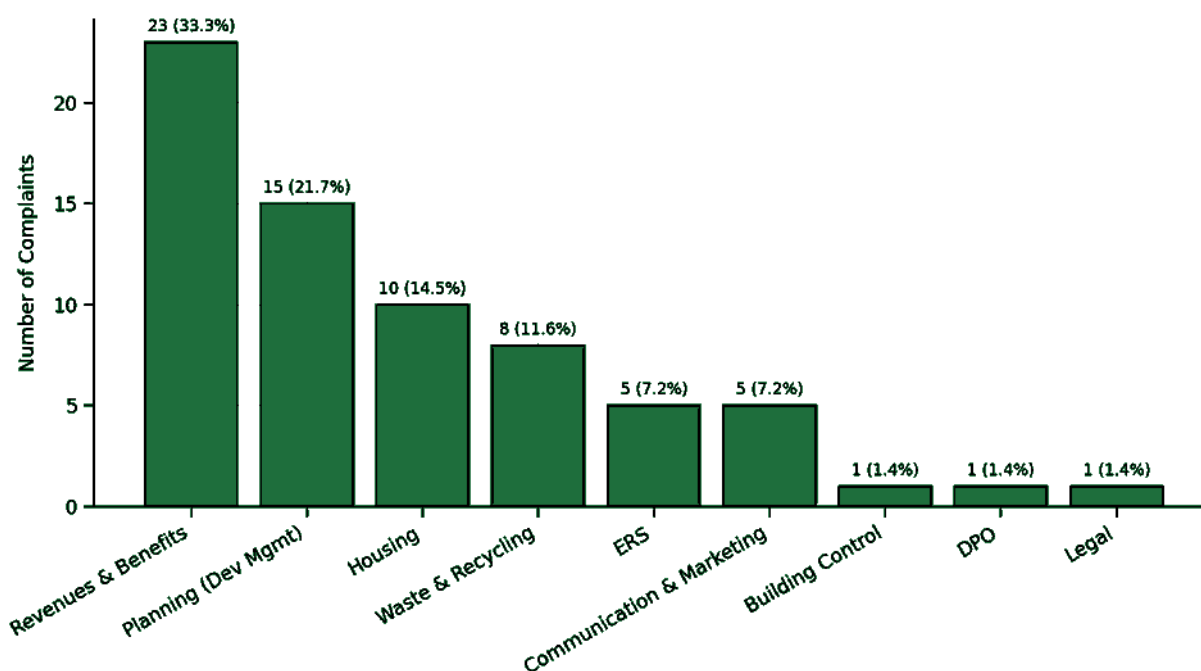
3.4 Below is a summary of the stage 2 complaints received about services provided by the Council during the financial year 1 April 2025 – 31 March 2026 along with the percentage which were responded within target shown in a table and graph format.

Stage 2 Complaints	Q1 25/26	Q2 25/26	Q3 25/26	Q4 25/26	Total	%
Responded to within 20 working days	1	2	4	4	11	65%
Awarded an extension	1	1	1	0	3	18%
Not responded to within 20 working days	1	0	1	0	2	12%
% Ongoing	0	0	1	0	1	5%
Total answered within policy						100%
Total	3	3	7	4	17	



- 3.5 Under the Policy, stage 1 complaints are responded to by the service area for which the complaint has been raised, and the stage 2 complaint is undertaken by an independent officer. Unless very complex, all stage 2 complaints are completed by the Complaints Team.
- 3.6 With regards to the Stage 1 complaints which did not meet the 10-working day target (3.3% / 2 complaints out of 61 total), performance remains high, with 97% of complaints responded to within Policy timescales (either within 10 working days or with an agreed extension). A focus in 2026/27 will continue to utilise the 10-day extension provision where appropriate, ensuring service areas have sufficient time to respond while maintaining compliance with Policy timescales.
- 3.7 Below provides a breakdown of the complaints received by service area. The highest number of complaints were received in **Revenues and Benefits (23 complaints, 38%)**, followed by **Planning / Development Management (15 complaints, 25%)**, and **Housing (10 complaints, 16%)**. **Waste and Recycling** accounted for **8 complaints (13%)**, with **ERS and Communication and Marketing** each receiving **5 complaints (8%)**, and only small numbers across other service areas.
- 3.8 Whilst the Council receives a wide range of complaints, the majority relate to areas where formal decisions have been made, rather than the standard of service delivery. This is particularly evident in-service areas such as Revenues and Benefits, Planning and Housing, which together account for the majority of complaints and where outcomes are often determined through statutory or policy-led decision-making processes.

Stage 1 Complaints by Service Area (WODC)



3.9 The majority of complaints that have been assessed and deemed exempt under the complaints process fall into the following categories: -

- Service issues
- Challenges to planning decisions
- Housing appeals

3.10 Where a complaint is assessed as exempt from the complaints process, it will be passed to the relevant department to respond to and record accordingly, or the complainant will be advised about the route to appeal.

3.11 We have historically tended to respond to many complaints which could / should be exempt from the complaints Policy, such as planning complaints. Planning complaints in the majority are raised as the complainant is dissatisfied with a planning decision, however reference is often also made to a dissatisfaction with the process. This financial year, a more robust approach will be taken to ensure complaints that are exempt are not taken through the formal complaints process, this avoids further dissatisfaction as the complaints process is unable to provide remedy to such complaints.

3.12 As per the Council's Policy the list below sets out all types of complaints that are exempt from the complaints process:

- Where you have, or previously had, a right of appeal or to take legal action. This may include tribunals (such as a Housing Benefit Appeal), Housing Benefit and Council Tax Support decisions, or planning appeals.
- Where the complaint is challenging a planning judgment or a decision not to take enforcement action.
- Where the complaint is challenging a licensing or other quasi-judicial decision, and legal rights of challenge exist (for example, appeal to the Magistrates' Court).
- Where the matter is a personnel issue, such as employment or disciplinary matters.
- Complaints regarding the handling of Freedom of Information requests.
- Complaints relating to Data Protection matters.
- Complaints about the conduct of elected Members.
- Requests for a service or reports of a service failure, for example a missed bin collection.
- Complaints submitted more than 12 months after the complainant became aware of the issue.

3.13 Complaint volumes were relatively consistent throughout the year. There was a slight increase observed in Q2 and Q3.

4. DETAILS OF ANY FINDINGS OF NON-COMPLIANCE WITH THE CODE

4.1 We currently do not keep a record of complaints that have been exempted from the Policy. This is something that we will record for financial year 1 April 2026 – 31 March 2027.

4.2 All other areas of the Code have been compliant.

5. SERVICE IMPROVEMENTS MADE AS A RESULT OF LEARNING FROM COMPLAINTS

5.1 Of the 61 Stage 1 complaints recorded over the reporting period, 50 (82%) were not upheld and 8 (13%) were upheld. A further 2 complaints (3%) were closed, and 1 (2%) remains ongoing at the end of the period. The table below shows the data for this financial year.

5.2 We consider a 'lesson learnt' to be when 'knowledge or understanding is gained by an experience'. This could be as a direct result from a positive or negative experience. When it's positive, we will look to see if it can be applied elsewhere, and when it's negative, we want to ensure that the issue is not repeated.

5.3 A summary of the improvements made resulting from the complaints received are as follows:

- Communication with customers has been strengthened, particularly within Revenues and Benefits, to ensure that account information, billing, and enforcement actions are accurate, clearly explained, and issued in a timely manner.
- Improvements have been made to internal processes and system controls to address issues such as incorrect billing, inconsistent portal information, and failures in processing account changes, with regular reviews put in place to maintain data accuracy.
- Operational issues within waste and recycling services have been addressed through enhanced monitoring, clearer escalation processes, and targeted employee training to reduce missed collections and improve service reliability.
- Oversight of contractors and third-party processes has been reinforced following a data breach incident, with strengthened controls and clearer accountability measures introduced to reduce risk.

- Internal communication and coordination between services have been improved to ensure customer circumstances (such as changes in residency or account status) are processed promptly and consistently across teams.
- Service improvements have been implemented in response to recurring issues, including process reviews, system updates, and ongoing monitoring to improve overall customer experience and prevent repeat complaints.

	Q1 25/26	Q2 25/26	Q3 25/26	Q4 25/26	Total
Closed	0	1	1	0	2
Not Upheld	9	11	16	14	50
Upheld	1	4	1	2	8
Ongoing	0	1	0	0	1

THE OMBUDSMAN'S ANNUAL LETTER 2025/26

- 6.1 A total of 13 complaints were referred to the LGO in 2025/26 which are set out in the Annual Letter attached at Annex A of which:
- 1 was not for the Council
 - 11 were assessed and closed with no action taken.
 - 1 complaint was investigated and upheld.
- 6.2 The upheld complaint was regarding concerns that the Council failed to appropriately involve the complainant in the Disabled Facilities Grant (DFG) process, resulting in works that differed from the approved plans and were considered unsafe.
- 6.3 The LGO investigation identified fault on the part of the Council, which caused injustice to the complainant. The Council agreed to issue a formal apology, make a compensatory payment of £500, and undertake a site visit to assess and address any outstanding works required.
- 6.4 In addition, the Council reminded relevant employees of their responsibilities to ensure that DFG works are completed in line with approved plans and meet the needs of the applicant.
- 6.5 The Council addressed all the concerns of the DFG applicant and the work was satisfactorily completed enabling the LGO to sign-off the complaint.

6.6 Of the complaints referred to the LGO, 4 related to corporate and other service, 3 benefits and revenues, 2 for planning, 2 for environmental services and one for housing. If we are more robust in our approach to exemptions, this should reduce the volume of complaints which are raised with the LGO and closed by the LGO after initial enquiries.

6.7 The number of complaints referred to the LGO has increased compared to last financial year, where a total of 11 complaints were referred, with no complaints upheld.

7. ANY OTHER RELEVANT REPORTS OR PUBLICATIONS ISSUED BY THE LGO RELATING TO THE COUNCIL

7.1 There is nothing further to add under this section.

8. PROPOSED CHANGES TO THE CUSTOMER COMPLAINTS POLICY AND PROCEDURE

8.1 The service is starting to see an increase in the number of complaints that have been generated using Artificial Intelligence (AI). These are often long, will quote case law, policy, and process that is on occasion inaccurate and create additional work to follow up unnecessary lines of investigation.

8.2 As such, it is proposed to make a change to the Policy. This is in-line with guidance from the LGO. The following change is recommended:

Proposed change to the Complaints Policy:

The Council recognises that members of the public may choose to use Artificial Intelligence (AI) tools to assist in drafting correspondence or complaints. While we do not restrict the use of such tools, all submissions must remain:

- *Accurate*
- *Relevant to the matter being raised, and*
- *Proportionate in length.*

Where a lengthy AI generated complaint has been submitted, the Council reserves the right to:

- *Greatly summarise unnecessarily lengthy or repetitive complaints and respond only to the substantive issues raised;*
- *Issue brief position statements rather than detailed responses if the complaint includes excessive or irrelevant commentary.*
- *Where correspondence appears to have been generated using AI in a way that produces excessive volume, repetitive material, or content that does not relate*

meaningfully to the issue, the Council may apply its unreasonable behaviour provisions.

- 8.3** It is also recommended to provide guidance to users who may choose to use AI to help produce their complaint. This would be added to the complaints page on the Council's website.

When you bring a complaint to us, we need to understand your personal experience and how the issues have affected you. Simple, clear language that explains what happened will always be more helpful than complicated, formal writing.

If you choose to use AI to help produce your complaint, here are some suggestions to get the best results from AI tools when writing your complaint:

- *Keep your AI prompts focused on your experience and how it impacted on you. Consider using the following prompt:*

“Rewrite the text below as a clear, polite complaint. Use only the information I have provided. Do not add or invent new facts. Be concise and professional, but not too formal. Include a closing paragraph suggesting how I would like the complaint to be resolved.”

- *Do not ask AI to add legal arguments, use formal legal language or reference laws to try and make your complaint sound more ‘official’. AI will often add irrelevant or incorrect legal information, making the resolution of your complaint more difficult.*
- *It is important to check any AI-generated text to make sure it reflects your own personal experience and contains accurate information.*

9. FINANCIAL IMPLICATIONS

- 9.1** There are no direct financial implications arising from this report.

10. LEGAL IMPLICATIONS

- 10.1** There are no direct legal implications arising from this report.

11. RISK ASSESSMENT

- 11.1** This report relates to the Council's management of complaints. If our complaint handling arrangements are weak then the Council is at risk of failing to continuously improve, reputational damage, financial impact through remedy and action from the LGO.

12. EQUALITIES IMPACT

13.1 An equalities impact assessment is not required for this report

13. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

14.1 There are no climate or ecological emergency implications arising directly from this report

14. ALTERNATIVE OPTIONS

14.1 This report is for noting and therefore no alternative options have been presented.

15. BACKGROUND PAPERS

NONE