

Policy & resources COMMITTEE

21/07/2025

Corporate Compliments & Complaints Policy
and Vexatious & Unreasonable Customer
Behaviour Policy

POLICY AND RESOURCES COMMITTEE

PART I

CORPORATE COMPLIMENTS & COMPLAINTS POLICY

AND

VEXATIOUS & UNREASONABLE CUSTOMER BEHAVIOUR POLICY

(ADCCC)

1 Executive Summary

- 1.1 This report seeks approval for the updated Corporate Compliments & Complaints Policy and the accompanying policy on managing Vexatious & Unreasonable Customer Behaviour.
- 1.2 The updated Compliments & Complaints Policy ensures greater clarity, consistency, and transparency in how complaints are handled across the council. It aligns with current best practice and recent changes to the Local Government and Social Care Ombudsman (LGSCO) guidance, set out in the Complaint Handling Code. It aims to strengthen accountability and clarifies what constitutes a complaint versus other forms of feedback, service requests, or appeals. The policy also introduces clearer timelines, roles, and escalation routes, improving the customer experience and supporting early resolution.
- 1.3 The Vexatious & Unreasonable Customer Behaviour Policy replaces the Vexatious & Unreasonable Complaints Policy clarifying the scope of the policy to cover all customer contact not just complaints. It sets out a fair and proportionate approach to managing customer interactions that are persistent, abusive, or disproportionate, which can undermine effective service delivery and impact staff wellbeing.

2 Recommendation

- 2.1 That: Policy & Resources Committee agree the updated Corporate Compliments & Complaints Policy and the new Vexatious & Unreasonable Customer Behaviour Policy to replace the Vexatious & Unreasonable Persistent Complaints Policy.

3 Details

- 3.1 Specific updates to the Corporate Compliments & Complaints Policy include:
 - 3.1.1 Updated format to new brand style.
 - 3.1.2 Reworded introduction and aims of the policy to include reference to LGSCO.
 - 3.1.3 Updated definition of a complaint.
 - 3.1.4 Extended time limit to allow customers to submit a complaint up to 12 months after the issue, an increase from 90 days.

- 3.1.5 Extend the time limit for stage two responses from 10 working days to 15 working days. This is still 5 working days shorter than LGSCO guidance for stage two responses.
- 3.1.6 Clearer description of the complaint's stages.
- 3.1.7 Section added to consider accessibility and offer to assist customers with making a complaint if needed.
- 3.1.8 Instructions added on what customers should include in their complaint.
- 3.1.9 Removal of specific Senior Leadership Team (SLT) roles and stated as SLT.
- 3.1.10 Update to anonymous complaints section confirming that the council may still investigate in some situations but will not provide a response.
- 3.1.11 Examples of remedies added.
- 3.1.12 Section on reporting and learning added.
- 3.1.13 Inclusion of the statement that complaints data is published on the council's website.
- 3.2 Specific updates to the Vexatious & Unreasonable Customer Behaviour Policy include:
 - 3.2.1 Clarification of the scope of the policy that it applies to all customer contact, not just complaints.
 - 3.2.2 Aligning our interpretation with the LGSCO interpretation of unreasonable behaviour.
 - 3.2.3 Including accessibility and equality considerations when implementing contact restrictions.
 - 3.2.4 Inclusion of the Corporate Complaints Officer to implement contact restrictions.

4 Options and Reasons for Recommendations

- 4.1 To update the policies to align with the LGSCO complaint handling code and to provide greater clarity and transparency on the council's complaints process and managing unreasonable customer behaviour.

5 Policy/Budget Reference and Implications

- 5.1 The recommendations in this report are not within the council's agreed policy as the report intends to update the council's complaint handling policy and how the council manages unreasonable customer behaviour.
- 5.2 The recommendations in this report are within the council's agreed budgets.

6 Staffing, Environmental, Community Safety, Public Health, Risk Management and Health & Safety Implications

- 6.1 None specific.

7 Financial Implications

- 7.1 None specific.

8 Legal Implications

- 8.1 While there are no legal implications arising out of this report, it should be noted that the LGSCO issued a Complaint Handling Code to local councils under its powers to issue advice and guidance under section 23(12A) of the 1974 Local Government Act. This means councils should demonstrate they have considered the Code when developing policies and procedures and responding to individual complaints. The Code sets out the expectations for complaint handling as well as scrutiny and oversight by senior officers and elected officials. The LGSCO have also issued good practice guides to support effective complaint handling.

9 Equal Opportunities Implications

- 9.1 An equalities impact assessment has been completed.
- 9.2 An additional section has been added to the Corporate Compliments & Complaints policy stating that customers can request assistance from the council to make a complaint.
- 9.3 An additional section has been added to the Vexatious & Unreasonable Customer Behaviour policy stating that before any contact restrictions are applied consideration must be given to whether the customer has any disability, health, vulnerability or communication difficulty affecting their behaviour.

10 Environmental Implications

- 10.1 A Sustainability impact assessment has been completed.
- 10.2 The council proactively promotes the use of digital channels to make a complaint, however making a complaint needs to be accessible for all and so complaints must be accepted via phone, by letter or in person.

11 Customer Services Centre (CSC) Implications

- 11.1 CSC have responsibility for managing the complaints process and holding complaint data. The responsibility for investigating and responding to complaints is with the relevant Service Manager or Head of Service.

12 Communications and Website Implications


- 12.1 Approved policies will be published on the council's website.

13 Risk and Health & Safety Implications

- 13.1 The Council has agreed its risk management strategy which can be found on the website at <http://www.threerivers.gov.uk>. In addition, the risks of the proposals in the report have also been assessed against the Council's duties under Health and Safety legislation relating to employees, visitors and persons affected by our operations. The risk management implications of this report are detailed below.
- 13.2 The subject of this report is covered by the Customer Experience service plan(s). Any risks resulting from this report will be included in the risk register and, if necessary, managed within this plan.

Nature of Risk	Consequence	Suggested Control Measures	Response (tolerate, treat, terminate, transfer)	Risk Rating (combination of likelihood and impact)
Poor handling of complaints	Reputational damage, loss of trust	Escalation process, CMT and Member oversight	Treat	6
Increase in complaints due to greater awareness	Higher workload, slower response times, greater referral to the LGSCO	Clear policy scope, manage expectations	Tolerate	6
Unreasonable customer behaviour	Stress for staff, misuse of resources	Support for staff, implementation of contact restrictions	Treat	6

13.3 The above risks are scored using the matrix below. The Council has determined its aversion to risk and is prepared to tolerate risks where the combination of impact and likelihood scores 6 or less.

Very Likely  Likelihood Remote	Low 4	High 8	Very High 12	Very High 16
	Low 3	Medium 6	High 9	Very High 12
	Low 2	Low 4	Medium 6	High 8
	Low 1	Low 2	Low 3	Low 4
	Impact Low -----> Unacceptable			

Impact Score
4 (Catastrophic)
3 (Critical)
2 (Significant)

Likelihood Score
4 (Very Likely (≥80%))
3 (Likely (21-79%))
2 (Unlikely (6-20%))

1 (Marginal)

1 (Remote ($\leq 5\%$))

- 13.4 In the officers' opinion none of the new risks above, were they to come about, would seriously prejudice the achievement of the Strategic Plan and are therefore operational risks. The effectiveness of the management of operational risks is reviewed by the Audit Committee annually.

Report prepared by: Josh Sills – Head of Customer Experience

Data Quality

Data sources:

Self-Assessment against LGSCO complaint handling code

LGSCO Complaints Handling Code

Data checked by:

Mandy Baker – Customer Services Manager

Data rating:

1	Poor	
2	Sufficient	X
3	High	

Background Papers

- Corporate Compliments & Complaints Policy – September 2023
- Vexatious & Unreasonably Persistent Complaints Policy – September 2023

APPENDICES / ATTACHMENTS

1. Corporate Compliments & Complaints Policy – June 2025
2. Vexatious & Unreasonable Customer Behaviour Policy – June 2025

