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## **1.0 INTRODUCTION**

Armagh City, Banbridge and Craigavon Borough Council is committed to providing excellent services to all of our residents, businesses and visitors to the Borough, or to anyone with whom we engage. This is evident in our Customer Care Strategy June 2017. There may, however be times when customers feel that our services have fallen below the standard they expect.

This policy is in place to ensure that where a customer has taken the time to make a corporate complaint that Council officers will respond as promptly as possible to ensure an informal resolution and if they are still dissatisfied that then we have processes in place to ensure that their corporate complaint will be fully investigated formally.

We welcome the feedback obtained about our services and will use it to continually improve service delivery and improve customer satisfaction. We are also committed to ensuring that the principles of good administration are adhered to as set out in Northern Ireland Public Services Ombudsman (NIPSO) guidance.

## **2.0 AIM / PURPOSE**

A corporate complaint is any oral or written expression of dissatisfaction by any person about the service, actions or inactions of the Council or its officers, which requires a response.

The aim of this policy is to ensure that all corporate complaints are dealt with in accordance with the NIPSO 'Principles of Good Complaint Handling' in a fair and consistent manner and information obtained from corporate complaints is used to help us continually improve our service delivery and provide excellent customer care.

## **3.0 SCOPE**

The Policy applies to all Council departments, the work of contractors and/or anyone providing services on behalf of Council. Responsibility for implementation of this policy sits with the senior management team and staff as they respond to and deal with corporate complaints.

## **4.0 POLICY DETAILS**

The corporate complaint must relate to something for which the Council has responsibility. For example, it may relate to one or more of the following:

- Poor quality of service;
- Refusal to provide a service;
- Delay in providing a service;
- A member of staff's behaviour; or
- Unfair treatment under a Council policy.

***These are for illustration purposes only***

Procedures for dealing with corporate complaints have been developed to ensure a consistent and fair approach in the handling of corporate complaints. As departments and the services they provide vary in nature, they will develop internal arrangements for ensuring that relevant procedures are followed.

## **Who Can Complain?**

The Corporate Complaints Procedure via our website:

[www.armaghbanbridgecraigavon.gov.uk/contact-us](http://www.armaghbanbridgecraigavon.gov.uk/contact-us) includes guidance for customers on what is and is not considered to be a corporate complaint and advice on other matters which fall outside the scope of the corporate complaint procedure.

The complainant must be the person who directly had the experience with the Council. If they need help to make their complaint, they must give signed authority/written permission for another person to act on their behalf in relation to their complaint. If they are unable to sign due to capability reasons, they most likely already will have a legal appointee who can act on their behalf.

There may be other situations when it is not possible to obtain written consent such as:

- Where the individual is a child and not of sufficient age or understanding to make a complaint on their own behalf.
- Where the individual is incapable and has no legal appointee.

## **Complaints Concerning On-going Statutory Council work and or investigations.**

Council departments are involved with statutory/formal investigations sometimes involving complex technical and professional judgement issues for the staff involved. If a customer has a corporate complaint in relation to an on-going statutory work/investigations by Council which involves the staff concerned, then that will be dealt with as a corporate complaint in the normal way commencing with informal resolution as with other cases where possible. However, if part or all of the complaint received relates to the technical complexities or professional judgements still unresolved/inconclusive at the time of the corporate complaint being made then in most cases those will be dealt with as part of the ongoing statutory work/investigation and will not be dealt with as part of the corporate complaint. However, each corporate complaint is dealt with on its own merits and there may be times when the relevant Department believes that the technical/other matters raised should be dealt with as part of the corporate complaint process.

## **Is there a deadline for making a corporate complaint?**

We will do all we can to look into corporate complaints. However, it can be difficult to look into matters, which may have happened some time ago. In general, we expect complaints to make any corporate complaint as soon as possible after the matter arises and no later than three months afterwards.

**If the issue is more than three months old** unfortunately it may not be investigated unless there is a good reason for the delay e.g. where the customer/service user has been unable to make their corporate complaint earlier due to incapacity.

## **Anonymous Corporate Complaints**

We do not encourage anyone to make anonymous complaints as we cannot acknowledge or reply to any unnamed individual. However, we will investigate each complaint and deal with any relevant service improvement issues identified where time and resources allow. If an anonymous corporate complaint relates to an individual employee, then it will not be investigated under the corporate complaint procedure.

## **How to make a corporate complaint?**

We would request that a customer/service user who has a corporate complaint firstly to speak to a member of staff in the relevant department/service/facility/venue as it may be possible to resolve it promptly and informally.

Customers can also make a corporate complaint using any of the following options:

- **Complete a corporate complaints form:** available online at: [www.armaghbanbridgecraigavon.gov.uk/complaints](http://www.armaghbanbridgecraigavon.gov.uk/complaints) or at any of our Council offices/facilities/venues.
  - **Email:** [complaints@armaghbanbridgecraigavon.gov.uk](mailto:complaints@armaghbanbridgecraigavon.gov.uk)
  - **By telephone:** 0300 0300 900 (and asking for the relevant department)
  - **In person:** at any of the Council offices/facilities/venues.
  - **By letter:**  
Customer Correspondence  
Armagh City, Banbridge & Craigavon Borough Council  
Old Armagh City Hospital  
39 Abbey Street  
ARMAGH  
BT61 7DY
- By Textphone:** 028 3832 9757

### **Use of social media**

Customers/service users may use the Council's Facebook or Twitter accounts to make contact in relation to queries about Council services or to inform us initially about a complaint they have. If they wish to take the matter further, then they are requested to use one of the other methods listed above.

### **Putting things right**

We will endeavour to put things right by acknowledging, explaining and apologising, and where possible explaining what may be done to prevent similar complaints.

### **Confidentiality**

All complaints will be dealt with in accordance with the requirements of the Data Protection and Freedom of Information legislation.

### **Retention of Corporate Complaint Documentation**

Retention of complaint documentation will be in adherence with the Council's records retention and disposal schedule.

## **5.0 ROLES AND RESPONSIBILITIES**

Corporate complaints will be dealt with impartially, objectively and professionally.

### **Council staff/those providing a service on behalf of Council**

Staff who are approached with a corporate complaint shall where possible direct the complainant onto the relevant officer or department if they know who that might be, otherwise they shall advise the complainant to contact the Council by phone or check the Council's website to submit a complaint online or email [complaints@armaghbanbridgecraigavon.gov.uk](mailto:complaints@armaghbanbridgecraigavon.gov.uk)

### **Customer Relations Officer**

Part of the role of the Customer Relations Officer is to facilitate the development and implementation of this Policy, corporate complaints procedures and guidance and to assist departments with associated awareness raising and training.

**Staff** may be responsible for investigating corporate complaints informally after the matter has first been brought to the attention of Council.

### **Managers and Heads of Department**

Managers and Heads of Department are responsible for ensuring that corporate complaints received in relation to a service they deliver are dealt with in accordance with this Policy, the corporate complaint procedure and when they are investigating corporate complainants that they do so in a fair and consistent manner and in accordance with agreed procedures/guidance. They should also ensure that any third party who is providing a service on behalf of their department is aware of Council corporate complaints procedures. This may be made clear in relevant contract/other service level agreement documentation.

**Heads of Department** are also responsible for ensuring there is at least one departmental contact for coordination of all departmental corporate complaints.

### **Strategic Directors/Chief Executive**

Strategic Directors are responsible for ensuring that when they are investigating or reviewing Stage 3 corporate complaints that they do so in a fair and consistent manner and in accordance with this Policy and the corporate complaints procedures and guidance. The Chief Executive or a Strategic Director has responsibility for overseeing the investigation of Stage 3 corporate complaints, the last, and final stage of redress within the Councils' corporate complaints procedure, at which point the complainant will be informed of their right to take the complaint to NIPSO.

## **6.0 RELATED POLICIES / PROCEDURES**

- Customer Care Strategy
- Corporate Complaints Procedure
- Unreasonable Customer Behaviour Policy
- Access to Information Policy
- Data Protection Policy
- Records Management Policy
- Safeguarding Policy
- Data Protection Act Subject Access Request Protocol
- Freedom of Information Requests Protocol
- Environmental Information Requests Protocol
- Equality Scheme

## 7.0 EQUALTY SCREENING FORM

### Policy Screening Form

#### Policy Scoping

**Policy Title:** Corporate Complaints Policy

**Brief Description of Policy (please attach copy if available). Please state if it is a new, existing or amended policy.**

This is a new corporate complaints policy.

**Intended aims/outcomes. What is the policy trying to achieve?**

The aim of the policy is to have a consistent approach in place to ensure that we deal with corporate complaints in a fair and consistent manner and to use the information obtained from corporate complaints to improve service delivery and customer satisfaction.

#### Policy Framework

Has the policy been developed in response to statutory requirements, legal advice or on the basis of any other professional advice? Does this affect the discretion available to Council to amend the policy?

The policy sets the context for our corporate complaints procedures which have been developed based on the Northern Ireland Public Services Ombudsman guidance.

**Are there any Section 75 categories which might be expected to benefit from the policy? If so, please outline.**

All Section 75 Categories will benefit from this policy.

**Who initiated or wrote the policy (if Council decision, please state). Who is responsible for implementing the policy?**

**Who initiated or wrote policy?**

Martina McNulty, Head of Department:  
Performance and Audit

**Who is responsible for implementation?**

All Council departments.

**Are there any factors which might contribute to or detract from the implementation of the policy (e.g. financial, legislative, other)?**

None known.

#### Main stakeholders in relation to the policy

Please list main stakeholders affected by the policy (e.g. staff, service users, other statutory bodies, community or voluntary sector, private sector)

Customers and all service users and any person who seeks, is entitled to or receives a service from the Council, Council staff or anyone providing services on behalf of Council including contractors, Elected Members.

**Are there any other policies with a bearing on this policy? If so, please identify them and how they impact on this policy.**

- Customer Care Strategy
- Corporate Complaints Procedure
- Unreasonable Customer Behaviour Policy
- Access to Information Policy
- Data Protection Policy
- Records Management Policy
- Safeguarding Policy
- Data Protection Act Subject Access Request Protocol
- Freedom of Information Requests Protocol
- Environmental Information Requests Protocol

### Available Evidence

Council should ensure that its screening decisions are informed by relevant data. What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for each of the Section 75 categories.

Section 75 category	Evidence
Religious belief	The Policy has been developed based on Northern Ireland Public Services Ombudsman Guidance. The Corporate Complaints Policy is available to all our Customers
Political opinion	The Policy has been developed based on Northern Ireland Public Services Ombudsman Guidance. The Corporate Complaints Policy is available to all our Customers
Racial group	The Policy has been developed based on Northern Ireland Public Services Ombudsman Guidance. The Corporate Complaints Policy will be available in a range of formats on request
Age	The Policy has been developed based on the Northern Ireland Public Services Ombudsman Guidance. The Corporate Complaints Policy is available to all our Customers
Marital status	The Policy has been developed based on the Northern Ireland Public Services Ombudsman Guidance. The Corporate Complaints Policy is available to all our Customers
Sexual orientation	The Policy has been developed based on the Northern Ireland Public Services Ombudsman Guidance. The Corporate Complaints Policy is available to all our Customers
Men and women generally	The Policy has been developed based on the Northern Ireland Public Services Ombudsman Guidance. The Corporate Complaints Policy is available to all our Customers



Disability	The Policy has been developed based on the Northern Ireland Public Services Ombudsman Guidance. The Corporate Complaints Policy will be available in a range of formats on request. Staff will provide information on the complaints procedure for customers wishing to make a corporate complaint and provide any assistance they may require.
Dependants	The Policy has been developed based on the Northern Ireland Public Services Ombudsman Guidance. The Corporate Complaints Policy is available to all our Customers

### Needs, experiences and priorities

Taking into account the information gathered above, what are the different needs, experiences and priorities of each of the following categories in relation to this particular policy/decision?

Section 75 category	Needs, experiences and priorities
Religious belief	N/A
Political opinion	N/A
Racial group	A range of formats will be available on request if required
Age	N/A
Marital status	N/A
Sexual orientation	N/A
Men and women generally	N/A
Disability	A range of formats will be available on request if required. Staff assistance will also be available where required.
Dependants	N/A

### Screening Questions

#### 1. What is the likely impact on equality of opportunity for those affected by this policy for each of the Section 75 categories?

Category	Policy Impact	Level of impact (Major/minor/none)
Religious belief	None	None
Political opinion	None	None
Racial group	Different formats may be required	Minor
Age	None	None
Marital status	None	None
Sexual orientation	None	None
Men and women generally	None	None
Disability	Different formats may be required	Minor
Dependants	None	None

#### 2. Are there opportunities to better promote equality of opportunity for people within the Section 75 categories?

Category	If yes, provide details	If no, provide reasons
Religious belief		No

Political opinion		No
Racial group		No
Age		No
Marital status		No
Sexual orientation		No
Men and women generally		No
Disability		No
Dependents		No

**3. To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion, or racial group?**

Category	Details of Policy Impact	Level of impact (major/minor/none)
Religious belief	N/A	N/A
Political opinion	N/A	N/A
Racial group	N/A	N/A

**4. Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?**

Category	If yes, provide details	If no, provide reasons
Religious belief	N/A	N/A
Political opinion	N/A	N/A
Racial group	N/A	N/A

**Multiple Identity**

Generally speaking, people fall into more than one Section 75 category (for example: disabled minority ethnic people; disabled women; young Protestant men; young lesbian, gay and bisexual people). Provide details of data on the impact of the policy on people with multiple identities. Specify relevant s75 categories concerned.

The Corporate Complaints Policy is available to all our Customers and has considered the needs of a range of customers.

**Disability Discrimination (NI) Order 2006**

Is there an opportunity for the policy to promote positive attitudes towards disabled people?

A range of formats will be available on request if required and staff assistance will also be available where required.

Is there an opportunity for the policy to encourage participation by disabled people in public life?

A range of formats will be available on requests if required and staff assistance will also be available where required.

## Screening Decision

### A: NO IMPACT IDENTIFIED ON ANY CATEGORY – EQIA UNNECESSARY

Please identify reasons for this below

### B: MINOR IMPACT IDENTIFIED – EQIA NOT CONSIDERED NECESSARY AS IMPACT CAN BE ELIMINATED OR MITIGATED

Where the impact is likely to be minor, you should consider if the policy can be mitigated or an alternative policy introduced. If so, an EQIA may not be considered necessary. You must indicate the reasons for this decision below, together with details of measures to mitigate the adverse impact or the alternative policy proposed.

The aim of this policy is to have a consistent approach in place to ensure that we deal with Corporate Complaints in a fair and consistent manner and to use the information obtained from corporate complaints to improve service delivery and customer satisfaction. This policy will be available for all our Customers. However, it is possible that those of a different race and those with a disability may require assistance. As a mitigation a range of formats will be available on request and assistance from staff will be available where required.

### C: MAJOR IMPACT IDENTIFIED – EQIA REQUIRED

If the decision is to conduct an equality impact assessment, please provide details of the reasons.

### Timetabling and Prioritising

If the policy has been screened in for equality impact assessment, please answer the following questions to determine its priority for timetabling the equality impact assessment.

On a scale of 1-3 with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for equality impact assessment.

Priority criterion	Rating (1-3)
Effect on equality of opportunity and good relations	
Social need	
Effect on people's daily lives	

The total rating score should be used to prioritise the policy in rank order with other policies screened in for equality impact assessment. This list of priorities will assist the council in timetabling its EQIAs.

Is the policy affected by timetables established by other relevant public authorities? If yes, please give details.

### Monitoring

Effective monitoring will help the authority identify any future adverse impact arising from the policy. It is recommended that where a policy has been amended or an alternative policy introduced to mitigate adverse impact, monitoring be undertaken on a broader basis to identify any impact (positive or adverse).

Further information on monitoring is available in the Equality Commission's guidance on monitoring ([www.equalityni.org](http://www.equalityni.org)).

Identify how the impact of the policy is to be monitored

This policy will be reviewed in May 2020

### Approval and Authorisation

A copy of the screening form for each policy screened should be signed off by the senior manager responsible for that policy. The screening recommendation should be reported to the relevant Committee/Council when the policy is submitted for approval.

Screened by	Position/Job title	Date
Mary Hanna	Equality Officer	April 2018
Cara Toner	Customer Relations Officer	April 2018
Approved by	Position/Job Title	Date
Martina McNulty	Head of Department: Performance and Audit	April 2018

## Appendix I - Rural Needs Impact Assessment (RNIA) Template

### SECTION 1 - Defining the activity subject to Section 1(1) of the Rural Needs Act (NI) 2016

#### 1A. Name of Public Authority.

Armagh City, Banbridge and Craigavon Borough Council

#### 1B. Please provide a short title which describes the activity being undertaken by the Public Authority that is subject to Section 1(1) of the Rural Needs Act (NI) 2016.

Corporate Complaints Policy, the aim of the policy is to have a consistent approach in place to ensure that we deal with corporate complaints in a fair and consistent manner and to use the information obtained from corporate complaints to improve service delivery and customer satisfaction.

#### 1C. Please indicate which category the activity specified in Section 1B above relates to.

Developing a	Policy <input type="checkbox"/>	Strategy <input type="checkbox"/>	Plan <input type="checkbox"/>
Adopting a	Policy <input type="checkbox"/>	Strategy <input type="checkbox"/>	Plan <input type="checkbox"/>
Implementing a	Policy <input checked="" type="checkbox"/>	Strategy <input type="checkbox"/>	Plan <input type="checkbox"/>
Revising a	Policy <input type="checkbox"/>	Strategy <input type="checkbox"/>	Plan <input type="checkbox"/>
Designing a Public Service	<input type="checkbox"/>		
Delivering a Public Service	<input type="checkbox"/>		

#### 1D. Please provide the official title (if any) of the Policy, Strategy, Plan or Public Service document or initiative relating to the category indicated in Section 1C above.

Corporate Complaints Policy

#### 1E. Please provide details of the aims and/or objectives of the Policy, Strategy, Plan or Public Service.

The aim of the policy is to have a consistent approach in place to ensure that we deal with corporate complaints in a fair and consistent manner and to use the information obtained from corporate complaints to improve service delivery and customer satisfaction.

**1F. What definition of 'rural' is the Public Authority using in respect of the Policy, Strategy, Plan or Public Service?**

Population Settlements of less than 5,000 (Default definition). Other

Definition (Provide details and the rationale below).

A definition of 'rural' is not applicable.

*Details of alternative definition of 'rural' used.*

N/A

*Rationale for using alternative definition of 'rural'.*

*Reasons why a definition of 'rural' is not applicable.*

## SECTION 2 - Understanding the impact of the Policy, Strategy, Plan or Public Service

2A. Is the Policy, Strategy, Plan or Public Service likely to impact on people in rural areas?

Yes  No  If the response is **NO** GO TO Section **2E**.

2B. Please explain how the Policy, Strategy, Plan or Public Service is likely to impact on people in rural areas.

2C. If the Policy, Strategy, Plan or Public Service is likely to impact on people in rural areas differently from people in urban areas, please explain how it is likely to impact on people in rural areas differently.

**2D. Please indicate which of the following rural policy areas the Policy, Strategy, Plan or Public Service is likely to primarily impact on.**

Rural Businesses	<input type="checkbox"/>
Rural Tourism	<input type="checkbox"/>
Rural Housing	<input type="checkbox"/>
Jobs or Employment in Rural Areas	<input type="checkbox"/>
Education or Training in Rural Areas	<input type="checkbox"/>
Broadband or Mobile Communications in Rural Areas	<input type="checkbox"/>
Transport Services or Infrastructure in Rural Areas	<input type="checkbox"/>
Health or Social Care Services in Rural Areas	<input type="checkbox"/>
Poverty in Rural Areas	<input type="checkbox"/>
Deprivation in Rural Areas	<input type="checkbox"/>
Rural Crime or Community Safety	<input type="checkbox"/>
Rural Development	<input type="checkbox"/>
Agri-Environment	<input type="checkbox"/>
Other (Please state)	<input type="text"/>

**If the response to Section 2A was YES GO TO Section 3A.**

**2E. Please explain why the Policy, Strategy, Plan or Public Service is NOT likely to impact on people in rural areas.**

This is a Corporate Complaints Policy which is applicable to all our customers.



## SECTION 3 - Identifying the Social and Economic Needs of Persons in Rural Areas

**3A. Has the Public Authority taken steps to identify the social and economic needs of people in rural areas that are relevant to the Policy, Strategy, Plan or Public Service?**

Yes  No  If the response is **NO** GO TO Section **3E**.

**3B. Please indicate which of the following methods or information sources were used by the Public Authority to identify the social and economic needs of people in rural areas.**

Consultation with Rural Stakeholders	<input type="checkbox"/>	Published Statistics	<input type="checkbox"/>
Consultation with Other Organisations	<input type="checkbox"/>	Research Papers	<input type="checkbox"/>
Surveys or Questionnaires	<input type="checkbox"/>	Other Publications	<input type="checkbox"/>
Other Methods or Information Sources (include details in Question 3C below).			<input type="checkbox"/>

**3C. Please provide details of the methods and information sources used to identify the social and economic needs of people in rural areas including relevant dates, names of organisations, titles of publications, website references, details of surveys or consultations undertaken etc.**

**3D. Please provide details of the social and economic needs of people in rural areas which have been identified by the Public Authority?**

**If the response to Section 3A was YES GO TO Section 4A.**

**3E. Please explain why no steps were taken by the Public Authority to identify the social and economic needs of people in rural areas?**

This is a Corporate Complaints Policy which is applicable to all our Customers.

**SECTION 4 - Considering the Social and Economic Needs of Persons in Rural Areas**

**4A. Please provide details of the issues considered in relation to the social and economic needs of people in rural areas.**

N/A

## SECTION 5 - Influencing the Policy, Strategy, Plan or Public Service

5A. Has the development, adoption, implementation or revising of the Policy, Strategy or Plan, or the design or delivery of the Public Service, been influenced by the rural needs identified?

Yes  No  If the response is **NO** GO TO Section **5C**.

5B. Please explain how the development, adoption, implementation or revising of the Policy, Strategy or Plan, or the design or delivery of the Public Service, has been influenced by the rural needs identified.

If the response to Section **5A** was **YES** GO TO Section **6A**.

**5C. Please explain why the development, adoption, implementation or revising of the Policy, Strategy or Plan, or the design or the delivery of the Public Service, has NOT been influenced by the rural needs identified.**

This is a Corporate Complaints policy which is applicable to all our customers.

## SECTION 6 - Documenting and Recording

**6A. Please tick below to confirm that the RNIA Template will be retained by the Public Authority and relevant information on the Section 1 activity compiled in accordance with paragraph 6.7 of the guidance.**

I confirm that the RNIA Template will be retained and relevant information compiled.



<b>Rural Needs Impact Assessment undertaken by:</b>	Cara Toner
<b>Position/Grade:</b>	Customer Relations Officer
<b>Division/Branch</b>	Performance and Audit
<b>Signature:</b>	
<b>Date:</b>	
<b>Rural Needs Impact Assessment approved by:</b>	Martina McNulty
<b>Position/Grade:</b>	Head of Performance and Audit
<b>Division/Branch:</b>	Performance and Audit
<b>Signature:</b>	
<b>Date:</b>	