



# Complaints procedures in local government

## Informing your customers

Complaints  
procedures in  
local government

219

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**Keywords** *Local government, Complaints, Customer satisfaction*

**Abstract** *Recently, the British Standards Institution (BSI) issued a new standard: BS 8600:1999 Complaints Management Systems – Guide to Design and Implementation. This standard tends to focus on those systems and procedures that organisations put into motion after a complaint has been received. However, for many customers, particularly of large organisations such as local government services, the problems begin with knowing how to gain access to the complaints system. In the public sector this visibility usually takes the form of some kind of information leaflet which should detail certain basic information that will allow customers to access the complaints system. This paper develops a framework for an effective customer complaints information leaflet and then evaluates Scottish councils' corporate complaints information brochures against this framework to determine whether or not they meet its acceptance criteria for effectiveness. Each leaflet was evaluated against 12 points of good practice developed from both Central Government's guidelines and the new British Standard guidelines. The results showed that although a majority of them met many of the framework criteria, a significant proportion fell well short of what would be deemed acceptable.*

### Introduction

A complaint is an expression of dissatisfaction, about the standard of service, actions or lack of action by the council, affecting an individual customer or group of customers (Western Isles Council, 1999).

Consumers expect quality services. Complaints, as the above quotation states, generally arise from dissatisfaction with products or services. They occur when organisations fail to meet customers' expectations. Every organisation, whether from the public, private or voluntary sector, that offers goods or services to the public is likely to receive complaints at some time (Goodwin and Ross, 1990). In the public sector in particular, research reveals that satisfaction with complaints is low (Cabinet Office, 1999, p. 5). How an organisation manages complaints, therefore, can have a significant impact on its effectiveness and consumer perceptions.

Common causes of complaint include failure to do something when promised, inefficiency, rudeness, delays, failure to keep customers informed of changes and inflexibility (Freemantle, 1998). Desatnick and Detzel (1993) add to this list discourteous, inept, incompetent service, often the result of mere apathy or inattention.



Access, information and redress are three key consumer principles at stake when examining consumer complaints in local council services. Access is concerned with consumers being able to obtain services required to make a complaint. Relevant, accurate and easily understood information is therefore important for consumers to make their complaints effectively, and redress mechanisms will enable consumers to have service failures put right (Consumer Congress, 1993).

The Government highlights the importance of redress in its White Paper *Modern Markets: Confident Consumers* (DTI, 1999). It acknowledges that when things go wrong people want to obtain redress quickly and easily. This document sets out the extent of the problem in the UK and presents evidence to demonstrate that consumer complaints require effective complaints management systems. In 1998, the number of complaints reported to Trading Standards Departments (in local government) totalled 900,000; Citizens' Advice Bureaux dealt with over six million problems in the same year and during a recent period of six months, over one-fifth of people have had reason to complain about goods and services. Another survey by Freemantle (1998) reports that the extent of the problem is even greater as 73 percent of customers in a survey had cause to complain to one organisation or another during the previous year.

Although the statistics reveal rising levels of customer dissatisfaction, Linton (1995, p. 145) suggests that complaints are vital to a customer-focused organisation. They provide an opportunity to discover weaknesses in service provision, identify areas for improvement and demonstrate high levels of customer care in resolving the issues. Effective customer complaints procedures can help organisations to improve both product and service quality by offering unhappy customers a method of feeding back information to the providers of those goods and services. Also, they have been instrumental in developing a quality culture within organisations by focusing on customer requirements.

There is an important link between complaints and best value. In a paper discussing the consumer perspective on best value in local government, The Scottish Consumer Council outlines the importance of a well designed and publicised complaints procedure. The council comments that good complaints procedures help resolve any problems that arise in service delivery, provide information to service managers and instil confidence in services by their users. Further, it is argued that the existence of an accessible complaints procedure, along with active encouragement to use it, will foster a sense of participating in improving services, and so ownership of the decisions that result (Scottish Consumer Council, 1997). This is consistent with the duty to consult required to achieve best value.

Recently, recognising the importance of complaints management, the British Standards Institution (BSI) issued a new standard: *BS 8600:1999, Complaints Management Systems – Guide to Design and Implementation* (BSI, 1999). The scope of this British Standard gives guidance on designing and implementing systems for the management of complaints from the stage of initial reporting to

resolution of the problem. Although it does not lay down performance criteria for the management of complaints, it does provide an overview of the points to consider. The standard is designed for use by organisations of all sizes in the private, public and voluntary sectors. This guide can be used regardless of the nature of the activities of the organisation and regardless of the nature of the complaint.

Since 1991, when the Government launched its Citizen's Charter programme, public services have been required to introduce and publicise their procedures for handling users' complaints and resolving grievances (National Consumer Council, 1994). The Government relaunched this programme in 1998 under the title of *Service First, The New Charter Programme*, which aims to improve service delivery across the public sector (Cabinet Office, 1998). Guidelines developed for the new programme set out a framework for handling complaints and give examples of good practice from public services (Cabinet Office, 1999, p. 5). The framework is geared for use by all public sector organisations that deal with members of the public. It therefore applies to local government.

For many customers, particularly of large organisations such as local government services, the problems begin with knowing how to gain access to the complaints system. In other words, knowing how, where and to whom the complaint should be made. In local government there is the added dimension of the political environment particular to councils. Elected members have a role in dealing with complaints from local people. Councillors are accountable to the public every four years at the ballot box. It is therefore in their interest to ensure complaints are handled effectively.

Complaints are made in different ways. The system for complaints can be fairly complex, including a mix of formal and informal procedures. Sometimes the complaint will be made formally, in writing, with the assistance of elected members. At other times, the complaint will take the form of a passing comment to a gardener or library assistant (Skelcher, 1992, p. 65). This complexity has implications for the quality of the process and the accurate measurement of complaints. When considering services which are tendered out and where consumers cannot use the usual channels for complaint provided by the council, it can be even more difficult to register a complaint. To alleviate problems, complaints mechanisms need to be highly visible. In the public sector this visibility usually takes the form of some kind of information leaflet which should detail certain basic information that will allow customers to access the complaints system. In order to emphasise the importance of making such information available to customers/citizens, Central Government in the UK may put a duty on all local councils to publish and publicise their corporate customer complaints procedure through legislation in the form of a Freedom of Information Act (Cabinet Office, 1998b).

The aim of this paper is to develop a framework for an effective complaints information leaflet and then to evaluate Scottish councils' corporate complaints information brochures against this framework to determine whether or not they meet its acceptance criteria for effectiveness. The framework is suitable for public and private sector organisations. In setting the context for this

framework, the paper will consider the importance of complaints. This will be achieved through a discussion of the cost of complaints for organisations, the importance of listening to and learning from complaints, consumer behaviour, management systems and the importance of good information.

### **Cost of complaints**

The cost of dealing with complaints can be high. A company in the leisure industry estimated the cost in management time spent investigating complaints. The loss of resources in telephone calls, correspondence and refund of expenses to complainants was in excess of £100 per complaint, ignoring the cost of redress related to the actual product or service (Martin, 1994, p. 5). Freemantle (1998, p. 2) highlights that declining service levels result in substantial losses in revenue. A typical medium sized company could lose as much as £16 million (\$25 million) for a 1 percent drop in service quality.

There are also costs associated with the organisation's reputation. Desatnick and Detzel (1993) suggest that the cost of an unhappy customer in the private sector is significant. Negative word of mouth can result in a dissatisfied consumer with a small problem typically telling ten other people about their experience. Consumers with large problems tell 16 others. A total of 13 percent of dissatisfied consumers tell their experiences to more than 20 people. In most instances, however, where consumer complaints are satisfactorily resolved, consumers go on to buy again. These points are reinforced by Gabbott and Hogg (1998) who suggest that most service management texts tell managers to encourage complaints and to look on consumer complaints as an opportunity to improve service provision.

### **Listening to improve performance**

Listening to complainants is extremely important. Evidence suggests that too often public services do not want to listen to complaints and consumers are passed from one member of staff to another. Yet, the information received from complaints could be gathered as feedback from users and incorporated at the heart of the management policy (Cabinet Office, 1999, p. 6).

Consumers require attention and sympathy from the service provider. They may be drawing on considerable emotional reserves to present their case (Katz, 1987). Even if the complaint is not valid, the organisation is provided with an opportunity to learn from the customer's perception of events.

A complaint provides an opportunity to put matters right (Plymire, 1991) and complaints can be used as either a management tool to improve performance or as part of a wider attempt to gain feedback and comments about a product or service. Mature organisations encourage customers to complain. They seek to convert complaining customers into satisfied customers, create a rapport to encourage repeat custom and seize the opportunity of direct customer contact as a learning encounter for the positive benefit of both parties (Martin, 1994, p. 57).

Organisations should identify the root cause of the complaint and make changes to prevent the same errors recurring in future, thus reducing the cost of staff time spent dealing with complaints in future. Where members of staff

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are criticised for being the subject of complaints, the organisation should avoid a “blame culture” as this can result in a situation where staff fear complaints and deal with them negatively or with hostility (Cabinet Office, 1999, p. 43). Employees need to know that they can rely on the support of senior managers when they address the concerns of complainants.

### **Consumer behaviour in relation to complaints**

Faced with an unsatisfactory experience, not all consumers complain. Thus, it is important to this study to consider the behaviour of consumers in relation to complaints as this can have significant implications for service quality.

Research by the Office of Fair Trading (OFT) reveals a wide discrepancy between consumer experiences of making complaints about goods (74 percent success) and services (34 percent success) and a wide variation within these broad categories. Less than half of 1 percent resolve their complaint through the courts or equivalent mechanisms. Regardless of their reasons for not taking their case further, this research clearly suggests there are a great number of consumers dissatisfied with the products or services they purchase and their subsequent treatment (OFT, 1991a). Reasons why a significant number of consumers do not take up their complaints or do not follow them through include the fact that some consumers “can’t be bothered” or “don’t think it would do any good”. Underlying this was thought to be a lack of awareness among consumers of their rights or the redress mechanisms available, confirming their view that more should be done to raise consumer awareness of these mechanisms and to make the mechanisms both more user-friendly and more effective. This study also found that some of those surveyed were less prone to complain, typically the younger or older age groups. Conclusions drawn from the OFT include that redress schemes should take full account of consumers’ lack of experience; the content and layout of forms should be clear, enabling complainants to complete the forms without assistance; the scheme must provide a speedy result; and should be effectively publicised.

Large organisations pose particular difficulties for complainants. Where consumers are dissatisfied, research suggests that individual problems or service failures appear to be treated as insignificant. Consequently, if consumers perceive a lack of interest from the service provider or if the complaint is unlikely to be taken seriously, service users will not complain (Gabbott and Hogg, 1998). This is particularly relevant to local government, which is a large and complex organisation.

Yet, there is evidence to suggest that customers who complain and receive a satisfactory response will become more loyal to that supplier than those customers who never complain. For example, Smith (1993) quotes a 1990 OFT report that produced evidence to the effect that if a supplier tried to resolve a complaint then at least 50 percent of dissatisfied customers would buy again. Significantly, this figure rose to 70 percent if the complaint was handled to the customer’s satisfaction. The reason for linking satisfaction and loyalty is that it is five times more expensive to attract a new customer than it is to retain an existing one. Therefore the way complaints are managed will have a direct

impact on customer satisfaction, customer loyalty and ultimately bottom-line results. However, in the context of the public sector, marketing theory and bottom-line profit do not, as in the private sector, underpin the value of consumer feedback. Yet, the public services, notably some local authorities, have been catching up with successful companies. The National Consumer Council (1994) suggests that "... the old 'we know best' style of public sector management has been replaced by a new awareness that consumers matter ...". Where consumer choice is limited – as is the case with most local government services – consumers should be encouraged to provide feedback.

### ***BS 8600:1999 Complaints Management Systems***

The BSI takes the view that effectively managed complaints provide organisations with a way to improve products, services and their public standing in the eyes of their customers. In the executive summary, the BSI points out that "... Whatever the size of an organisation, management of complaints is vital to creating and maintaining its effectiveness. If left unchecked, customer dissatisfaction may well have unwelcome knock-on effects. By actively encouraging complaints, an organization gains a second chance to capture customer loyalty and approval". Although this standard includes sections on accessibility of complaints procedures and information about how to complain, it tends to focus on those systems and procedures that organisations put into motion after a complaint has been received. The standard covers

- management involvement and commitment through adequate staff resourcing and training;
- recognizing and protecting the rights of customers and staff;
- providing customers with an open, effective and easy to use complaints system;
- utilizing external sources of redress e.g. ombudsman schemes, external review schemes, etc;
- monitoring complaints in order to improve the quality of services or goods;
- auditing the effectiveness of the system installed.

Companies that are already certified to ISO 9000 will already have some form of complaints handling system in place in order to meet the requirements of that standard. With regard to local government services this could lead to conflict between the "local" complaints procedure and the corporate complaints procedure. Two possible scenarios are worthy of discussion.

First, where a service has already achieved ISO 9000 and has to implement a corporate complaints procedure, senior management should ensure that such a procedure meets the requirements of the Standard. If that is the case, then the corporate procedure can act as a straight replacement for the local service procedure. Indeed, this paper argues that if best practice is followed in preparing the corporate procedure, this should be the case. If it is not then

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service managers may have a problem with overlap in some areas and contradictory advice in others. This would have to be addressed to avoid confusion to staff and customers.

Second, if there is already a corporate procedure in place and a service is aiming to achieve ISO 9000, then, if suitable, that procedure can be adopted and included in the service operations manual. If it does not meet the requirements then the service management will have to write their own local procedure, which may result in the conflicts outlined above. Following best-practice in the preparation of the complaints procedure by service and corporate personnel can eliminate any such problems.

### ***Service First: how to deal with complaints***

*Service First* (Cabinet Office, 1999, p. 8) stresses that information from complaints provides free feedback on service provision and results in the best form of free market research for the organisation. It is suggested that handling complaints properly demonstrates the importance of customer care to the organisation. Listening to users, learning from mistakes and continually trying to improve services are highlighted as beneficial aspects of such an approach. The basic principles of effective complaints systems are identified as being:

- easy to access and well publicised;
- speedy – with fixed time limits for action and keeping people informed of progress;
- confidential – to protect staff and those who complain;
- informative – providing information to management so that services can be improved;
- simple to understand and use;
- fair – with a full procedure for investigations;
- effective – dealing with all points raised and providing suitable remedies; and
- regularly monitored and audited – to make sure that it is effective and improved.

*Service First* suggests that consultation on procedures should take place with staff, consumers and other parts of the organisation that provide service to members of the public. The latter is important, as the organisation will aim to avoid communication problems such as may occur, for instance, between a local government department and a “contracted out” service. Examples where this may be an issue include housing repairs services, street cleaning services and catering services in schools.

### **Informing consumers about complaints procedures**

Complaints systems need to be easy to access and well advertised. Skelcher (1992, p. 67) highlighted the fact that few local authorities publicise their complaints procedures to citizens and customers. The OFT concludes that one

of the key reasons why consumers do not pursue their complaints further is a lack of awareness of the mechanisms available (OFT, 1991a). In another study of information needs, the OFT (OFT, 1991b) found that, in addition to the principles outlined above, consumers required more or better advice on who to complain to and how to complain.

*Service First* (Cabinet Office, 1999, p. 13) highlights the fact that many services produce a leaflet combined with a form for people to send in comments, compliments or complaints. Clear presentation, user-friendly language and up-to-date information are identified as important elements in leaflet design. The leaflets should be easily available and targeted effectively.

A comprehensive and rigorous approach to assessing performance in local government is required for best value. Indeed, performance measurement will be used to prove best value (Centre for Public Services, 1998). Complaints may be regarded as a key measurement of performance and provide one of the mechanisms to engage consumers in service development (Brennan and Douglas, 1999). The leaflets are therefore important in generating feedback.

Leaflets are useful not only for users, but also for non-users who might nevertheless have a reason to complain – for example residents living near to a local council leisure centre who may have concerns about noise, floodlighting and parking. Newsletters, booklets produced by the council and sessions on local radio or television also provide opportunities to raise awareness on complaints procedures.

### **Development of a best practice framework for a complaints leaflet**

The framework was developed from both central government's guidelines and the new British Standard guidelines to provide clear criteria from recent published sources. In the *Service First* (Cabinet Office, 1998a) guidelines, in addition to the principles outlined above, it is stated that leaflets on complaints should be written in clear language; procedures should be simple to operate and they should include operational and policy matters and be reviewed regularly. The *Service First* guidelines offer "top ten tips" for dealing with complaints. The framework developed for the leaflet addresses these tips where relevant. It encompasses the following 12 points of good practice:

- (1) *To show that the organisation takes complaints seriously and is committed to dealing with them the brochure should be endorsed by senior management.* The leaflet will, therefore, include a statement to that effect and may point out that the information gained from complaints will be used to improve services. Senior management seeking to gain the commitment of all staff to satisfying customer needs should "lead by example" and promote a positive approach to "getting things right". It would be appropriate for senior management to send staff a statement confirming the importance of dealing with complaints properly.
- (2) *Make it clear to customers/users that you welcome complaints and comments about the service and include a statement to that effect.* Encouraging compliments and comments as well as complaints can provide very useful feedback for the organisation. The organisation can



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learn about the areas in which it is perceived as effective in addition to finding out where it has problems. Staff may feel that an approach which seeks positive as well as negative comments is more acceptable from their perspective. Using a slogan such as the one used by Aberdeenshire Council (1997a): “Tell us what you think, A guide to making comments and complaints” might satisfy this requirement. Clackmananshire Council employs a “thumbs up, thumbs down” style, in relation to good/bad service, which may be good for attracting the attention of consumers.

In relation to local government services, the public may have a limited understanding of what to expect from the service. The *Service First* guidelines suggest that if people have a limited understanding of what the service offers, they will not complain, resulting in an artificially low number of complaints. Setting out clear standards of service may help the public to have realistic expectations and to understand the circumstances in which they can make a complaint. Aberdeen Council (1997b), for example, has developed and published leaflets outlining service standards for environmental development, arts and recreation, planning and customer service. One of the customer service standards states: “We will be easily identified, polite and helpful in dealing with the public. We will ensure staff are well informed about services in their divisions and are well trained”. These standards tackle some of the less tangible and less easily measured aspects of service provision such as the courteous nature and quality of staff. For a discussion on effective standard setting in local government see Brennan and Douglas (1998). Information included in leaflets, newsletters, local newspapers and posters, for example, will encourage consumers to make their complaints/comments known to the council.

- (3) *Include a working definition of a complaint.* BS 8600:1999 defines a complaint as “... any expression of dissatisfaction by a customer, whether justified or not”. Therefore if a customer is, for any reason, unhappy with a product or service, this will be considered by the organisation as a complaint. It may not be wise, however, to include whether justified or not on a leaflet as this suggests that the council may have doubts about the justification of the complaint. This may put off consumers from making the effort to bring the complaint to the attention of the organisation. *Service First* provides a working definition of a complaint as “... any expression of dissatisfaction that needs a response” (Cabinet Office, 1999, p. 8). With this definition, there is no issue of whether or not the dissatisfaction is justified. Also, this definition makes a reply explicit whereas the issue of a response could only be implied by the British Standard definition.

A definition used by an organisation should be relevant, should be the least restrictive definition to suit the organisation’s purpose and should be applied consistently across all services. North Lanarkshire Council (1998) provides the following definition, for example:

If you are dissatisfied with the quality of service provided by the Council, you are invited to complain.

Organisations are likely to be concerned about the definitions of a complaint and a comment. Local government, in particular, has a political dimension that makes it sensitive to complaints statistics. A council may receive a comment that highlights a part of the service that could be improved. It would be important to record such a comment and take action, where possible, to address the issue. However, the council would not record this type of comment as a complaint.

- (4) *Include an assurance that every complaint will be investigated thoroughly and impartially.* West Dunbartonshire Council (1998), in its leaflet, highlights that it will make sure that “We treat your complaint fairly and that we thoroughly investigate it”.

This council is stressing the importance of this aspect of the framework.

- (5) *Explain to customers/users how to complain and describe how any complaint will be dealt with.* Consumers need to know to whom they should make their complaint. There is little point in having an excellent complaints procedure if consumers do not know that they can make a complaint. The National Consumer Council (1991) in its report on social housing, found that, even where procedures were in place, 65 percent of tenants did not know of their existence. An outline of the stages of the complaints procedure will enhance the understanding of consumers. In the event that the complaint is not resolved to the satisfaction of the consumer, the leaflet should include a review stage and also the role of the local government ombudsman scheme which makes provision for external review.

Where services are contracted out, a requirement for an effective complaints procedure should be included in the contract. In addition, consideration is required for consumers from different ethnic minority groups. *Service First* suggests that “advocates” could be provided to assist these consumers.

- (6) *Ensure that customers/users can access your complaints system using a variety of methods (preferably free-of-charge) by including telephone and fax numbers as well as postal and e-mail addresses and who to contact face-to-face.* Access is an extremely important consumer principle in relation to complaints. Given that local government is a large and complex organisation, it is frustrating for consumers if they are passed from person to person. Linton (1995, pp. 91-2) stresses the importance of simplifying customer access for complaints.

Responsibility for investigating and replying to complaints should generally lie with the department responsible for failure in the service. Nonetheless, the complaints system should allow access to the supply chain at any point and via a range of methods, including telephone, letter, fax, e-mail or face-to-face. Indeed, the use of e-mail as a means of access is expected to grow in the future. The Labour Government

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included in its last election manifesto a commitment to give every person in the UK access to the Internet and World Wide Web (WWW) within five years. This can only be achieved through increasing access to computer terminals in schools, colleges, universities and public libraries. Most councils now have their own Web sites and their employees have e-mail addresses. All of these trends make complaining via e-mail much more likely in the future. However, this has implications for the management of complaints. Councils need to have in place collection and co-ordination procedures in order to ensure that complaints so received can be dealt with effectively. An interesting example of "best practice" in East Lothian Council promoting access was commended by *Service First* (Cabinet Office, 1999, p. 13). The council developed books of business cards which are given to all of their manual workers as the council is aware that it receives lots of complaints in this way.

*Service First* suggests giving names, addresses and phone numbers of staff or sections to contact with any complaint. Research cited by *Service First* revealed that most people prefer to use the phone to complain rather than putting their complaint in writing. Whereas 22 percent of complaints were made in person and 19 percent in writing, 58 percent of complaints were made by telephone. Not surprisingly, the telephone is also likely to result in the quickest response for consumers when a complaint arises. Yet, many organisations prefer to receive complaints in writing. In a recent study, for example, McDonald (1998) found that it was common for housing organisations only to accept, or indeed prefer, written complaints. Such a preference is likely to discriminate against those who may not be able to voice their grievances effectively in writing (National Consumer Council, 1991). Removal of barriers such as fear of discrimination is vital, particularly from users in a vulnerable position. Examples include a child in care and an elderly person in a local authority home. Confidential channels for complaints need to be provided and it should be made clear that users will not suffer as a result of making a complaint. Standard forms should also be written in plain English, free of jargon and easy to complete.

Access therefore generates many challenges for local government. Given the accessibility of many private sector organisations that can be contacted through call centres 24 hours, every day of the year, local government may wish to adopt a similar model. One example of good practice comes from the City of Bradford Metropolitan District Council. The initiative taken by this council was to launch a "council contact helpline" with a number which was easy to remember. Consumers could call the number to make complaints, ask for services or obtain information about the whole range of council services. They also installed a voice-processing system so that they could deal with more services direct. Lines were staffed 24 hours a day, every day of the year and staff were trained to handle complaints (Cabinet Office, 1999, p. 16).

Acknowledging the need to improve accessibility, another practical example cited in a *Compendium of Service Improvements* (Corporate Communications Unit, 1997) highlights the importance of publicising complaints procedures effectively. In this case study, details of the addresses, telephone (including extension numbers) and fax numbers of the various contact points for complaints have been issued with the local newsletters and are also displayed in the public counter areas.

No revenue should accrue to the organisation from complaints as a result of having to use high cost telephone numbers. On the contrary, it could be argued that access would be improved through the provision of a Freephone telephone number or a Freepost reply card. Also, it should be pointed out that assistance with making a complaint to a local authority could be obtained from advice agencies such as the Citizens' Advice Bureau.

- (7) *Include a statement assuring some form of corrective action or redress.* The importance of providing and publicising a method of redress is now increasingly recognised by local authorities (Rogers, 1994). On its publicity material for complaints, the organisation will include a statement pointing out that, wherever possible, the organisation will find a remedy. Shetland Islands Council (1998) states:

We shall investigate your complaint and, if it is clear that we were at fault, we shall apologise and try to put things right as soon as possible.

Redress procedures should be explicit. The National Consumer Council (1994) asserts that these procedures should be designed to provide remedies to all people with a grievance, not just those who voice their grievance through a formal complaints procedure. Where redress procedures are effective they are more likely to be used by consumers.

- (8) *Describe the circumstances and method by which a complaint will be escalated for action by more senior staff.* BS 8600:1999 recommends that in the case of a serious complaint things don't stand still and the complaints management system should be designed to ensure that key staff are alerted and the problem is dealt with by whoever has the appropriate expertise. Some local councils choose to outline this procedure through the use of a flow chart illustrating the stages of making a complaint and the people at different levels with responsibility for complaints handling. A simplified form of this flow chart may be appropriate for the leaflet.
- (9) *Include response time targets for all stages of the complaints process.* There is a need to provide clear information about the timescale for handling complaints. Complaints need to be acknowledged, a period of time is required to investigate complaints and consumers need to be kept informed regarding progress in resolving the issue. *Service First* suggests that this can be set out in four stages:
- an on the spot reply ("informal");
  - referral, investigation and reply;

- internal review; and
- external review.

Such information will enable consumers of local government services to understand the timescale involved in making a complaint.

- (10) *Cater for disadvantaged/minority customers, e.g. customers whose first language is not English or for those with impaired sight.* Information needs to be provided for consumers with special needs. The availability of information in the main minority languages, Braille, large print and audiocassette will promote access for several groups of consumers. East Lothian Council (1998) states clearly on the front of its feedback leaflet that:

This information can be made available on audiotape, in Braille and in some minority ethnic languages. If you would like a copy in one of these formats, please contact East Lothian Council . . .

- (11) *Where possible include a “menu” of remedies, e.g. replacement, refund or compensation.* This may include an apology, an explanation or an assurance that the same thing will not happen again. Financial compensation may also be considered but this is not an alternative to putting things right. Interestingly, the National Consumer Council (1994) found that organisations who make assumptions of knowing what the dissatisfied customer wants tend to focus on financial compensation. Yet, in the majority of cases customers are looking for a commitment from the organisation to prevent a recurrence rather than financial compensation. This is particularly important in the public sector as there may be resistance to the provision of financial redress because the organisation is using public money. If, for example, through incompetence, a council had to provide large sums of money to resolve consumer disputes, the consequence for local taxpayers may be higher bills. Also, in the public sector, it is worth acknowledging that ombudsman schemes include, as a form of maladministration, not offering a suitable remedy when one is due. Thus local authorities will need to develop suitable remedies to address consumer dissatisfaction.
- (12) *Since it is unlikely that all complaints will be able to be resolved internally, include an external review process and agree to abide by any decision made.* The local government ombudsman scheme in the UK plays an important role as the completely independent part of the public service complaints system. In addition, some councils employ an internal reviewer/arbitrator to provide independent advice for matters that would otherwise have involved the local government ombudsman. Thus there is an attempt to have an independent review of a case without the adverse publicity which may be generated from a report published by the external ombudsman scheme.

### Methodology

Having established a framework against which to evaluate customer complaints leaflets/brochures a letter was sent to each of Scotland’s 32 local councils

requesting a copy of their corporate complaints procedure literature. Of the 32 councils contacted 22 submitted their brochure for evaluation – a response rate of 69 percent. Each procedure was then evaluated against the 12 points of good practice identified in the framework and the results are detailed in Table I.

### Analysis of results

The best practice framework details 12 criteria that corporate complaints leaflets should cover. However, no attempt has been made to prioritise these 12 criteria, but

Council	1	2	3	4	5	6	7	8	9	10	11	12
Aberdeen		×	×									
Aberdeenshire		×			×	×		×	×			×
Clackmannanshire		×	×		×	×	×	×	×			
Dumfries & Galloway	×	×	×		×		×	×	×			×
Dundee City					×	×		×	×	×		×
East Ayrshire	×	×	×		×	×	×	×	×	×		×
East Lothian		×		×	×	×		×	×	×		×
East Renfrewshire		×	×				×		×			
Falkirk		×	×	×	×	×		×	×	×		×
Fife		×		×	×	×			×			×
Highland			×		×	×		×				×
Inverclyde	×	×		×	×	×		×	×			×
Moray			×		×	×		×	×			×
North Ayrshire		×		×	×	×	×	×	×			×
North Lanarkshire		×	×		×	×		×	×			×
Orkney Islands		×			×	×		×	×			×
Renfrewshire			×	×	×	×		×	×			×
Shetland Islands				×	×	×	×	×	×			×
South Lanarkshire		×			×	×		×	×			×
Stirling			×		×	×		×	×	×		×
West												
Dumbartonshire			×	×	×	×		×	×			×
Western Isles			×		×			×	×	×		×

**Notes:** 1 – to show that the organisation takes complaints seriously and is committed to dealing with them the brochure should be *endorsed by senior management*; 2 – make it clear to customers/users that you *welcome* complaints and comments about the service and include a *statement* to that effect; 3 – include a working *definition of a complaint*; 4 – include an assurance that every complaint will be investigated *thoroughly and impartially*; 5 – explain to customers/users *how* to complain and describe *how* any complaint will be dealt with; 6 – ensure that customers/users can *access* your complaints system using a *variety of methods* (preferably free-of-charge) by including telephone and fax numbers as well as postal and e-mail addresses and who to contact face-to-face; 7 – include a statement ensuring some form of *corrective action* or *redress*; 8 – describe the circumstances and method by which a complaint will be *escalated* for action by more senior staff; 9 – include *response time targets* for all stages of the complaints process; 10 – Cater for *disadvantaged/minority* customers; 11 – where possible include a “*menu*” of *remedies*; 12 – since it is unlikely that all complaints will be able to be resolved internally, include an *external review process* and agree to abide by any decisions made

**Table I.**  
Council evaluations against 12 point framework

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clearly some are more important than others to customers and service providers. Furthermore, the priority given to each criterion may vary depending on the demographics of the council, for example, where there are larger populations of ethnic minorities and English is not the first language then clearly criterion 10 should be given a high priority. Therefore, it is important, when evaluating each leaflet, to distinguish between those criteria that are “nice to have” and those that are more critical. As Table I reveals, no council’s complaints information leaflet met all 12 of the criteria developed from the best practice guides. Category scores ranged from two (Aberdeen City Council) to ten (East Ayrshire Council) with the average score being seven criteria met.

The comparative evaluation shows areas of strength and weakness. Most local authorities included a statement to encourage complaints and comments about the service and included a definition of a complaint. They explained how to complain, described how any complaint would be dealt with and ensured access using a variety of methods. Typically, the councils described the circumstances and method by which a complaint would be escalated for action by more senior staff, included response time targets for stages of the complaints process and outlined the availability of an external review process.

Nevertheless, a number of areas in particular were very badly lacking. None of the leaflets offered a “menu of remedies” showing what the customer/user might expect in the way of corrective action or redress. In relation to criterion 7, only seven leaflets contained general statements ensuring some form of corrective action or redress. The prospect of achieving a satisfactory solution or receiving an explanation regarding a complaint is an important aspect of an effective system. The councils who have not addressed this well need to pay more attention to this area as it is perceived as high priority. Service providers would like to know what they are able to offer customers by way of redress for service failures and customers would like to know that any complaint would be taken seriously and a solution sought, otherwise “why complain?”

Conversely, the lack of senior management endorsement in all but four of the evaluated leaflets may be deemed as low priority as far as consumers are concerned, particularly if the complaint is resolved to their satisfaction, although it is recognised that lack of such an endorsement may give the customers/users of services the impression that the complaints leaflets lacked legitimacy. Only six leaflets catered in some way for disadvantaged or minority groups, usually in non-English language. Where it is fair to say that some of Scotland’s more isolated areas may not have a significant minority of non-English speakers, there must be some customers/users with impaired sight and other physical disadvantages. Disappointingly, only eight leaflets stated explicitly that any complaint would be investigated fairly. This might inhibit customers/users from complaining on the basis of “What’s the point”? Again this is deemed critical to the complainant, although it may be that councils believe this to be implicit within their procedures. If that is indeed the case they would be better advised to make such a statement explicit.

As discussed in the literature, where consumer choice is limited, as is the case with local government, it is vital to engage consumers in the process of providing

valuable feedback which can then be used for continuous improvement of services. Mature organisations encourage consumers to complain. The design of an appropriate leaflet is only one part of the process of seeking to satisfy consumers, but as shown above, it has the potential to attract people to respond. It is therefore an important part of the process. If the complaints are then handled effectively and lessons are learned by the council from the root cause of the complaint, this is likely to impact positively on consumers.

### **Conclusion**

It has been established that complaints in local government arise from dissatisfaction with services. This is not surprising given the complexity of council services and the diverse mix of departments. Complaints may be made formally with assistance from elected members, or informally. However, in the public sector, satisfaction with complaints is low (Cabinet Office, 1999). The effective management of complaints is therefore likely to have a positive impact on consumers and will result in improved measurement information and reduced costs for the council.

The evidence presented in this paper suggests that complaints statistics are significant. During a six month period in 1998 over a fifth of people in the UK had reason to complain about goods and services (Department of Trade and Industry, 1999). Another survey found the level to be much greater at 73 percent of consumers having had cause to complain to an organisation in the previous year (Freemantle, 1998). Levels of success in resolving consumer dissatisfaction with services are lower at 34 percent than for goods at 74 percent (OFT, 1991a). This is likely to impact significantly on consumer perceptions of service providers, where the organisations who have failed to match customer expectations are viewed negatively by consumers. As local government is provided by the public purse, consumers are unlikely to have much choice in selecting a service provider. Local councils are also large and complex organisations providing a very wide range of services. In addition, to meet the requirements for best value, local government has a duty to consult consumers. It is therefore very important to ensure that local government is customer focused and that the customer care strategy for the organisation addresses customer complaints.

Complaints generate useful feedback for the organisation. Careful planning is required to inform consumers effectively about complaints. To be effective, complaints mechanisms need to be highly visible. This paper has concentrated on information leaflets on complaints in local government. The best practice framework for a complaints leaflet was developed from central government's *Service First* guidelines published in February 1999 and the *British Standard BS8600:1999 Complaints Management Systems – Guide to Design and Implementation*. Aspects which should be included in the leaflet are: to show that the organisation takes complaints seriously and is committed to dealing with them the brochure should be endorsed by senior management; make it clear to customers/users that you welcome complaints and comments about the service and include a statement to that effect; include a working definition of a



complaint; include an assurance that every complaint will be investigated thoroughly and impartially; explain to customers/users how to complain and describe how any complaint will be dealt with; ensure that customers/users can access your complaints system using a variety of methods (preferably free-of-charge) by including telephone and fax numbers as well as postal and e-mail addresses and who to contact face-to-face; include a statement assuring some form of corrective action or redress; describe the circumstances and method by which a complaint will be escalated for action by more senior staff; include response time targets for all stages of the complaints process; cater for disadvantaged/minority customers; where possible include a “menu” of remedies; since it is unlikely that all complaints will be able to be resolved internally; include an external review process and agree to abide by any decisions made.

At the time of analysing the complaints leaflets used by local government both of the publications used to shape the framework were new. As anticipated, therefore, the evaluation, shown in Table I, revealed a number of strengths and weaknesses as discussed in the analysis. It was found that there was considerable scope to improve the information for consumers who had some cause for complaint. One way for local government to improve complaints leaflets would be to present them clearly in user-friendly language, provide information which is up-to-date and address the 12 points set out in the above framework. The system must provide a speedy result and the scheme should be highly publicised.

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