



Borough of Telford and Wrekin

Cabinet

Thursday 16 May 2024

10.00 am

Council Chamber, Third Floor, Southwater One, Telford, TF3 4JG

Democratic Services: Jayne Clarke / Paige Starkey 01952 383205 / 380110

Media Enquiries: Corporate Communications 01952 382406

Lead Officer: David Sidaway - Chief Executive 01952 380130

Cabinet Members:

Councillor S Davies Leader of the Council

Councillor R A Overton Deputy Leader and Cabinet Member: Homes & Enforcement

Councillor E M Callear Cabinet Member: Education, Employment & Visitor Economy

Councillor L D Carter Cabinet Member: Place (The Economy & Neighbourhood Services)

Councillor N A M England Cabinet Member: Finance, Customer Service & Governance

Councillor C Healy Cabinet Member: Climate Action, Green Spaces, Heritage & Leisure

Councillor R Mehta Cabinet Member: Inclusion, Engagement, Equalities & Civic Pride

Councillor K Middleton Cabinet Member: Healthy, Safer & Stronger Communities & Partnerships

Councillor S A W Reynolds Cabinet Member: Early Years, Children & Young People

Councillor P Watling Cabinet Member: Adult Social Care & Health Systems

Invitees

Councillor A J Eade Conservative

Councillor W L Tomlinson Liberal Democrat

	Agenda	Page
1.0	Apologies for Absence	
2.0	Declarations of Interest	
3.0	Minutes of the Previous Meeting	3 - 10
	To approve the minutes of the last meeting held on 11 April 2024.	
4.0	Leader's Announcements	Verbal Report
	To receive a verbal update from the Leader of the Council.	
5.0	Annual Governance Statement 2023/24	11 - 32
	Cllr Nathan England - Cabinet Member: Finance, Customer Services & Governance	
	To receive the Annual Governance Statement for 2023/24.	
6.0	New complaint handling code and combined complaint policy	33 - 68
	Cllr Nathan England - Cabinet Member: Finance, Customer Services & Governance	
	To approve the changes made to the Complaint Handling Code and Combined Complaint Policy.	
7.0	Telford and Wrekin Climate Change Adaptation Plan	69 - 90
	Cllr Carolyn Healy - Cabinet Member: Climate Action, Green Spaces, Heritage & Leisure	
	To approve the Telford and Wrekin Climate Change Adaptation Plan.	

If you are reading these papers on an electronic device you have saved the Council £15.22 and saved 6.1kg of CO₂, based on average agenda printing costs for the 2022/23 municipal year.

CABINET

Minutes of a meeting of the Cabinet held on Thursday 11 April 2024 at 10.00 am in Council Chamber, Third Floor, Southwater One, Telford, TF3 4JG

PUBLISHED ON WEDNESDAY 17 APRIL 2024

(DEADLINE FOR CALL-IN: MONDAY 22 APRIL 2024)

Present: Councillors S Davies (Chair), R A Overton (Vice-Chair), E M Callear, L D Carter, N A M England, C Healy, R Mehta, K Middleton, P Watling and T J Nelson (as substitute for A J Eade).

Apologies: Councillors S A W Reynolds, A J Eade and W L Tomlinson.

CAB-54 Declarations of Interest

None.

CAB-55 Minutes of the Previous Meeting

RESOLVED - that the minutes of the meeting held on 15 February 2024 be confirmed and signed by the Chair.

CAB-56 Leader's Announcements

The Leader announced that following a year of delays he was continuing the battle to request a review of the decision to close Telford's A&E. No response had been received to the letter he had written three months ago asking that the term "A&E local" was no longer used and this had been followed up today. He was deeply distressed and disappointed that despite this, and conversations with the NHS locally, that no confirmation had been received that "A&E" local would not be used and that an alternative title for the downgrade of the A&E department had been offered.

The Leader reported that Shropshire Council had planned to close the Bridgnorth household recycling centre and that he had been clear that they should not close the facility. This would mean that residents from Bridgnorth and the surrounding area would be more likely to visit the facilities based in the Madeley area and residents in the borough would have to pick up the bill. The Leader had been clear with Shropshire Council that they should not close the facility. If this were to happen, the Council would have no option but to charge Shropshire Residents to access the facilities in South Telford but he was clear that there would be no charges for residents in Telford and Wrekin Council and further that no charges would be introduced for local residents for the collection of green bins.

The Leader praised Network Rail for the work they undertook with Telford and Wrekin staff and partners in order to reopen the railway in a time for Easter.

CAB-57 Annual Public Health Report

The Cabinet Member: Healthy, Safer & Stronger Communities & Partnerships presented the report of the Director: Health & Wellbeing (Statutory Director of Public Health).

The report asked Cabinet to endorse the recommendations as set out in the Annual Public Health Report 2024 which aimed to improve the emotional health and wellbeing of children and young people in the borough. It sought to ensure all children felt valued, visible and emotionally well and were able to access opportunities to achieve their aspirations and lead happy fulfilling lives.

An update on the local position across the Public Health Outcomes Framework provided a picture of the population health indicators across the life course.

Important work being undertaken included the Youth Year of Wellbeing campaign which celebrated projects and initiatives which supported and developed young people's emotional health and wellbeing. A targeted, community-based approach to improving outcomes was aligned to Government guidance.

Cabinet Members commented that it was important that children and young people get the best start in life and that they were supported emotionally. It was important that their views were listened to. Working alongside partners progress was being made but there were still challenges ahead.

The Deputy Leader of the Conservative Group welcomed the report but noted there was some uncomfortable reading. He highlighted that the figures for the young people not in education, employment or training (NEETS) of 16/17 year olds was now better than the England average and that vaccination rates were good. Consultation with young people themselves was a good approach and following the initial set of responses, 81 male and 16 female he felt that more could be done to encourage better female response rates. It was encouraging that the number of young people in contact with alcohol and drug services had reduced.

The Leader confirmed that the Council would continue to look at public health with a long lens and would continue to be creative and innovative in relation to youth employment, health and the economy.

RESOLVED – that the recommendations set out in the Annual Public Health Report 2024, improving the emotional health and wellbeing of children and young people in the borough be endorsed.

CAB-58 Draft Carers Strategy

The Cabinet Member: Adult Social Care & Health Systems presented the joint report of the Director: Adult Social Care and Director: Children's Safeguarding & Family Support which set out the approach to producing a place based, All Age Carers Strategy.

The role of carers continued to be vital to the whole social care system providing significant support to the people they cared for and the vision continued to recognise and value carers and support them in an impactful and meaningful way. It was necessary for partners to work together to ensure carers did not have to spend valuable time navigating a complex health and care system with various points of contacts but had accessible advice, information and support.

Engagement had taken place locally through a variety of methods which were set out in the report.

The key areas of the strategy were to develop the all age approach to supporting carers to enable them to have good physical and mental health and wellbeing, empowering carers to co-produce and drive change across the borough and to work in partnership with the wider community to promote a carer friendly borough.

Cabinet was asked to note that reference to a six-week consultation at 12.3 in the report. This was an error, and it should be a nine-week consultation as set out at 1.2 in the report.

Cabinet Members commented that the strategy needed to support a mix of carers and noted the number of children under 16 who were caring. It was important that young carer's education was not left behind and an all-age strategy was fully supported. They looked forward to receiving the consultation feedback.

The Deputy Leader of the Conservative Group welcomed the strategy and the current approach to supporting the navigation of complex health and care systems and he felt there was a need to rationalise and simplify this. It was requested that the consultation included all residents. As the strategy was 22 pages long, it was asked if an executive summary for lay people could be considered. He asked if the Council could support carers falling foul of the DWP in relation to carers allowance and benefits being stopped due to any changes.

The Cabinet Member: Adult Social Care & Health Systems confirmed that there was a carers' wellbeing guide used widely across the borough. The first points of contact document was produced in different formats including easy read and this would be revisited following the consultation. Different formats for the consultation would hopefully allow good participation. With regard to carers benefits being stopped, the council ensured that carers had a carers assessment which took them through the process and helped them to understand and navigate the system.

RESOLVED – that

- a) the approach set out in paragraphs 12.2 and 12.3 of the report in relation to consultation and engagement with unpaid carers be agreed;
- b) a nine-week consultation period starting on 18 April 2024 be approved; and
- c) delegated authority to the Director of Adult Social Care and Director of Children’s Safeguarding and Family Support in consultation with the Cabinet Member: Adult Social Care and Health Systems to receive the outcome of the consultation and update the All-Age Carers Strategy be agreed.

CAB-59 Visit Telford Destination Management Plan 2024 -2029

The Cabinet Member: Education, Employment and Visitor Economy presented the report of the Director: Communities, Customer and Commercial Services.

The report highlighted the current approach to supporting visitor economy within the borough and set out recent progress in raising awareness of Telford & Wrekin as a visitor destination.

It set out the five-year Destination Management Plan (DMP) for Telford & Wrekin which was underpinned by a detailed action plan guiding the Council to further grow the visitor economy and provided a framework for partnership work with key stakeholders, memberships and visitors.

Cultural events were a major draw locally, regionally and nationally and the Council would continue to build on their strong foundations.

Proposals to establish a new Local Visitor Economy Partnership (LVEP), working collaboratively with Shropshire Council and key partners were also detailed in the report. This would help support the visitor economy to thrive and bring community and economic benefits ensuring people stayed longer and spent more. The LVEP would bring added benefits of access to funding and support from Visit England and Visit Britain.

Following a consultation, 92% of residents who took part felt tourism had a positive impact and was an important part of the plan which focused on local residents and attracting visitors from further afield.

Cabinet Members welcomed the report. Ironbridge Gorge was a very important destination for the borough and region with attendance from visitors and local people as days out were vital and gave a real boost to the local economy. LVEP would bring forward good opportunities for the future. It was

important to showcase what was on offer and develop other areas around the borough in order that people stay longer to have a greater impact. Tourism had a direct impact with local businesses benefitting the most, particularly in relation to high inflation and high energy costs. Investment into the high street, leisure facilities and keeping the street clean was undertaken in partnership working with Town and Parish Councils. The visitor economy promoted green spaces, housing and employment opportunities. People visited Telford on a regular basis due to its offer.

The Deputy Leader of the Conservative Group commented on the substantial piece of work that had been undertaken. He noted the logic of the LVEP approach and was pleased that the Council would retain their independence. Objective and numeric standards that were directly measurable were welcomed. There were lots of things to be done including the took kits and passports to adventure and keeping focus on these was important.

The Leader confirmed that the plan was for the period 2024-29 and there were lots of opportunities for accountability through Cabinet and Council meetings. New visitors to the borough would grow the economy. Success breeds success. This was an excellent opportunity to do more on the agenda with the ambition to increase both regional and national visitor numbers. The level of energy costs was of concern leading to business closing or reducing operating hours. This reduces the visitor offer and this needed to be a national leadership priority.

RESOLVED – that

- a) the contribution that the Council is making to supporting the local visitor economy be noted;**
- b) the Destination Management Plan 2024 – 2029 be approved;**
- c) the setting up of a Local Visitor Economy Partnership be approved;**
- d) delegated authority be granted to the Director of Communities, Customer and Commercial Services, in consultation with the Cabinet Member for Education, Employment and Visitor Economy to:**
 - implement changes to the Destination Management Plan as required;**
 - Apply to Visit England to establish a Local Visitor Economy Partnership; and**
 - governance arrangements as set out in the Destination Management Plan be approved.**

CAB-60 2023-24 Leader and Cabinet Member Young Person's Grant Scheme

The Cabinet Member: Cabinet Member for Education, Employment & Visitor Economy presented the report of the Director: Children's & Family Services.

The report gave a summary of the 2023-24 Leader and Cabinet Member Young Person Grant Scheme and set out the recommendations for 2024-25 and 2025-26.

The scheme opened for applications between 1 December 2023 and 19 January 2024, with £14,000 being the allocated budget. Young people were able to apply for up to £500 each.

During 2023-24, the scheme was supported through sponsorship and match funding from external partners; Arriva; Balfour Beatty; Veiola and through the Virgin Media 02 Business Fund.

The main objective for the 2023-24 campaign was to receive 150 completed applications by the closing date. By close of the application window 155 applications had been received with 42% of applications being directly related to comms and social media.

During the reporting period 155 applications had been made with 116 being successful. Not all successful applications were awarded the full value of the costs requested and applications were scrutinised to ensure there were no alternative cost-effective ways to meet the requests.

Cabinet Members welcomed the applications being put forward noting that a small amount of money could do an awful lot of good. It was important to give the best start in life and help to remove barriers to children's success. They were proud to continue with the scheme due to the positive impact it had on so many young peoples lives.

The Deputy Leader of the Conservative Group welcomed the 155 applications that had been submitted and the successful grants which had helped people recognise their dreams.

The Leader expressed that this was one of the proudest things that he had done as a leader, investing a small amount of money to remove a barrier for a young person. A small amount of money could make a massive difference and meant a huge amount to the young people who benefitted from the award. He hoped that following their journeys they would continue to benefit the borough economy.

RESOLVED – that

- a) the outcomes of the Leader and Cabinet Members Young Person Grant Scheme for 2023-24 be noted;**

b) the launch of the Leader and Cabinet Members Young Person Grant Scheme for 2024-25 be noted; and

c) the continuation of the funding of the Leader and Cabinet Members Young Person Grant Scheme in 2025-26 be agreed.

CAB-61 Culture Peer Review 2023

The Cabinet Member: Climate Action, Green Spaces, Heritage & Leisure presented the report of the Director: Communities, Customer and Commercial Services.

The report set out the feedback received from the Cultural Peer Review undertaken in November 2023 and gave a summary of the key findings and recommendations to support the vision for culture and cultural participation across the borough going forward.

During their visit the peer team met with officers for a range of Council services, Senior Management Team, Members and a diverse mix of external cultural sector partners, individuals and Town and Parish Councils.

Overall feedback was positive and highlighted the 'energy and enthusiasm' of external partners and the Council teams. They recognised 'the positive foundations on which to build' and the range of partners the Council's Culture Service worked with, together with the significant investment in culture and events.

An evaluation was undertaken of the current priorities, together with future ambitions, and it was identified which areas had the best impacts given the available resources and it identified some areas for development. There was an opportunity to update the baseline data and that an audit of the existing cultural activity, venues and partners would enable a better understanding of participation levels and types of activity in order to identify gaps in provision

Key recommendations were set out in the report and a proposed action plan set out at Appendix A to the report.

Cabinet Members commented on the offer that the Council had with regard to events and high streets and culture could be seen as arts and theatre but covered every single aspect of the borough. Culture made a difference and if there was additional funding, more could be done. They highlighted the richness in the borough, the platform of opportunity and the appreciation of colourful and diverse carnivals.

The Deputy Leader of the Conservative Group welcomed the report and the benchmarking exercise. There were strong reference to the Council's strengths which were the free outdoor events which proved popular. In relation to the allocation of funds from the government, levelling up money had recently been received.

The Leader referred to the government cuts, but welcomed any additional funding that was received. He confirmed that the funding was more complicated than at first glance.

RESOLVED – that

- a) the feedback and recommendations from the Local Government Association and Arts Council England Cultural Peer Review, as summarised in Section 4 to the report be noted; and
- b) the action plan developed in response to the Peer Review and its delivery and continued development, to provide a framework for monitoring and supporting the cultural sector for the borough be approved.

The meeting ended at 10.58 am

Signed for the purposes of the Decision Notices

Anthea Lowe
Director: Policy & Governance
Date: **Wednesday 17 APRIL 2024**

Signed

Date: Thursday 16 May 2024



Telford & Wrekin
Co-operative Council

Protect, care and invest
to create a better borough

Borough of Telford and Wrekin

Cabinet

Thursday 16 May 2024

Annual Governance Statement 2023/24

Cabinet Member:	Cllr Nathan England - Cabinet Member: Finance, Customer Services & Governance
Lead Director:	Anthea Lowe - Director: Policy & Governance
Service Area:	Policy & Governance
Report Author:	Rob Montgomery – Audit & Governance Lead Manager
Officer Contact Details:	Tel: 01952 383103 Email: Robert.Montgomery@telford.gov.uk
Wards Affected:	All Wards
Key Decision:	Not Key Decision
Forward Plan:	Not Applicable
Report considered by:	SMT – 16 April 2024 Audit Committee – 29 May 2024 Cabinet – 16 May 2024

1.0 Recommendations for decision/noting:

Cabinet is asked to:

- 1.1 Approve the Annual Governance Statement 2023/24, attached as Appendix A (including Annex 1), and note the information in the report

2.0 Purpose of Report

- 2.1 For Cabinet to review and approve the 2023/24 Annual Governance Statement to accompany the annual accounts and the Local Code of Good Governance.

3.0 Background

- 3.1 Under the Accounts and Audit Regulations 2015, the Council is required to produce an Annual Governance Statement and it is best practice that the

statement is signed by the Leader and Chief Executive of the Council. This statement should accompany the Annual Accounts.

- 3.2 The Annual Governance Statement for 2023/24 is attached at Appendix A and has been developed based on the requirements of the regulations and CIPFA/Solace guidance. The statement includes an action plan (Annex 1) to ensure that we continue to improve our existing governance arrangements.
- 3.3 The action plan attached to the 2022/23 statement (implemented during 2023/24) has been reviewed and updated to reflect current progress. Any actions still in progress from the 2022/23 plan have been incorporated into the 2023/24 action plan, see Annex 1 at Appendix A.
- 3.4 The Annual Governance Statement and the Local Code of Good Governance outlines that the Council has a robust governance framework in place but that it is continually reviewing procedures to maintain and demonstrate good corporate governance. It is supported by risk management and sound systems of internal control which are paramount in these continuing times of financial constraint. The Council can be assured that during 2023/24, including during organisational and personnel changes, that the existing or revised governance arrangements have continued to support proper governance. Where required changes to procedures have been agreed by SMT and changes to the Constitution have been agreed by the Council, through the Council's Constitution Committee.
- 3.5 Assurance for the Annual Governance Statement is provided by all areas of the Council and externally by the following:
 - a) Leader and Chief Executive – who sign the statement to acknowledge their responsibilities;
 - b) Senior management – Chief Executive, Executive Directors, Directors;
 - c) Chief Financial Officer;
 - d) The Monitoring Officer;
 - e) Members – Scrutiny arrangements, Standards Committee, Audit Committee and other Regulatory Committees;
 - f) Internal Audit;
 - g) Partners;
 - h) External Audit; and
 - i) Other external inspection agencies.
- 3.6 The 2023/24 Annual Governance Statement sets out adherence to the Council's governance arrangements that operated during the period – 1st April 2023 to 31st March 2024 and measures the effectiveness of them.
- 3.7 The Council's current Local Code of Good Governance was previously approved by the Audit Committee to reflect the CIPFA/SOLACE framework including revised principles and guidance. The Code continues to reflect the Council's culture and values.

4.0 Summary of main proposals

- 4.1 Members of the Cabinet to approve the Annual Governance Statement 2023/24, attached as Appendix A (including Annex 1), and note the information in the report.

5.0 Alternative Options

- 5.1 Cabinet could determine not to approve the Annual Governance Statement, however, given it is a legal requirement for the Council to prepare one, this would be inadvisable. Consequently, Officers do not consider that there are any appropriate alternative options.

6.0 Key Risks

- 6.1 There are no key risks associated with this report.

7.0 Council Priorities

- 7.1 The report and its recommendations will ensure a community-focussed, innovative council providing efficient, effective and quality services.

8.0 Financial Implications

- 8.1 The governance framework includes several financial elements, including the Council's financial regulations, the Medium Term Financial Strategy and the Treasury Management Strategy. These provide the financial parameters, systems, processes and guidelines within which the Council must operate and, as such, assist in the delivery of good governance. Strong financial management also supports the delivery of value for money in ensuring economy, efficiency and effectiveness in the Council's decision making and processes.

The Council's external auditors give an opinion on the financial statements of the authority and a value for money conclusion in their opinion on the accounts and in their Annual Audit Findings Report each year which provides further assurance.

Costs associated with the Annual Governance statement are met from the Council's base budget.

9.0 Legal and HR Implications

- 9.1 The Council is required to comply with the requirements of the Audit and Accounts Regulations 2015. Regulation 6 of these Regulations sets out that the authority must conduct a review of the effectiveness of its internal control systems each financial year and prepare an annual governance statement. The annual governance statement must be approved in advance of the annual statement of accounts.

10.0 Ward Implications

10.1 Borough-wide impact.

11.0 Health, Social and Economic Implications

11.1 There are no health, social or economic implications directly arising from this report.

12.0 Equality and Diversity Implications

12.1 All members of the Internal Audit Team have attended equal opportunities/diversity training. If any such issues arose during any work the appropriate manager would be notified.

13.0 Climate Change and Environmental Implications

13.1 All members of the Audit & Governance Team are environmentally aware and if any issues were identified they would be notified to the appropriate manager.

14.0 Background Papers

- 1 CIPFA/SOLACE – Delivering Good Governance in Local Government: Framework (2016 Edition)

15.0 Appendices

- A Annual Governance Statement

16.0 Report Sign Off

Signed off by	Date sent	Date signed off	Initials
Finance	11/04/2024	18/04/2024	AEM
Legal	11/04/2024	18/04/2024	RP



Telford & Wrekin
Co-operative Council

Protect, care and invest
to create a better borough

Annual Governance Statement

2023/24

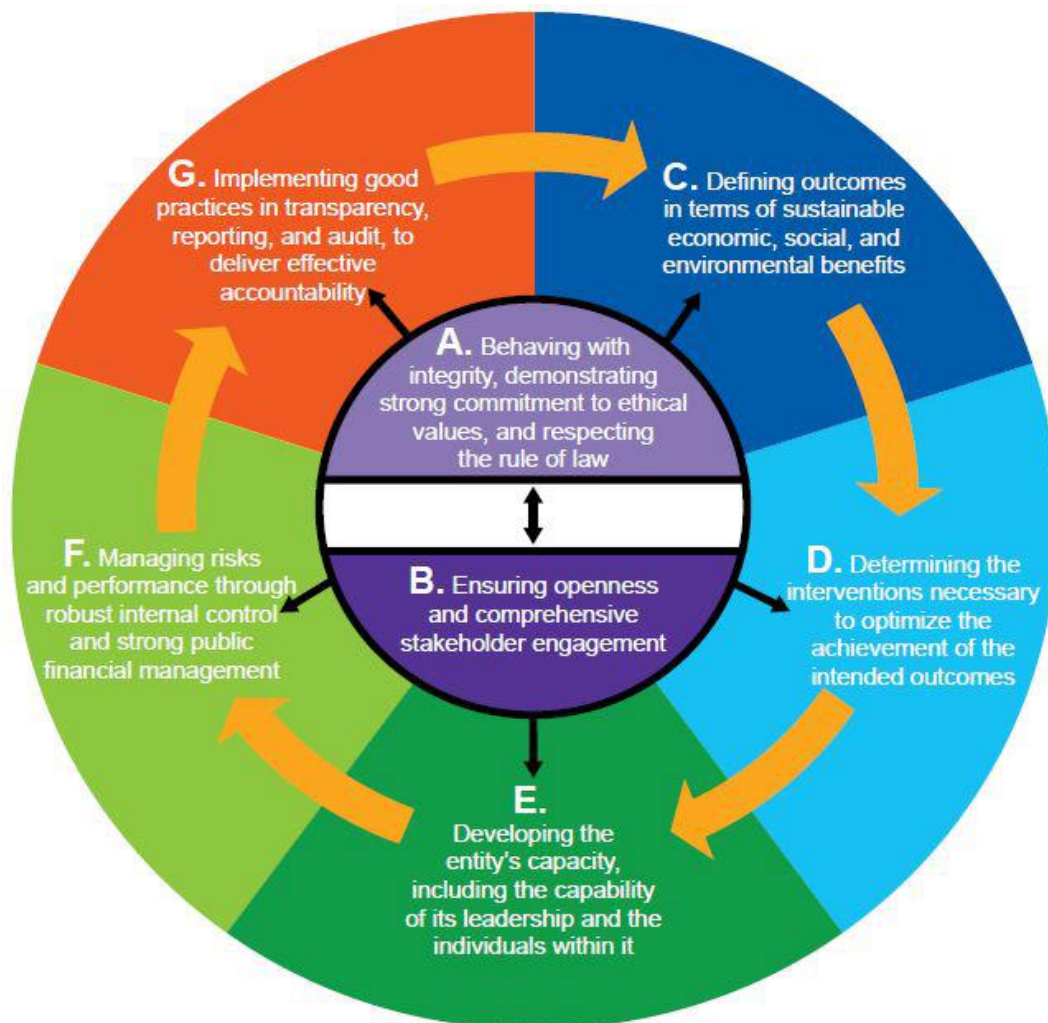


1. Introduction

1.1 Under the Accounts and Audit Regulations 2015 the Council is required to produce an Annual Governance Statement to accompany the Statement of Accounts which is approved by the Audit Committee.

The Annual Governance Statement outlines that the Council has been adhering to the Local Code of Corporate Governance, continually reviewing policies and procedures to maintain and demonstrate good corporate governance and that it has in place robust systems of internal control.

The Council has adopted the Code of Corporate Governance which is consistent with the principles of the CIPFA/SOLACE Framework – Delivering Good Governance in Local Government.



CIPFA's Principles of Good Governance

2. Standards of Governance

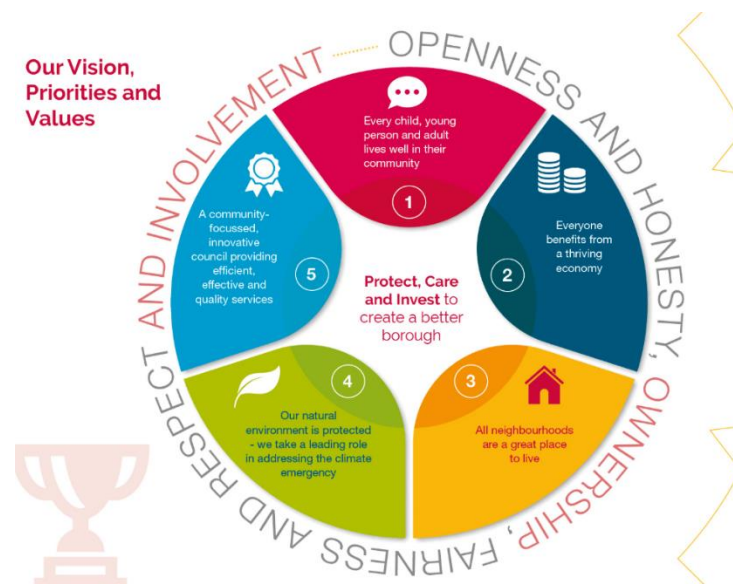
2.1 The Council expects all of its members, officers, partners and contractors to adhere to the highest standards of public service with particular reference to the employee and Members' Code of Conduct, Constitution, Corporate Vision, Priorities and Vision as well as applicable statutory requirements.

3. Scope of Responsibility

- 3.1 Telford & Wrekin Council is responsible for ensuring that its business is conducted in accordance with the law and proper standards. The Council needs to demonstrate that public money is safeguarded and properly accounted for and used economically, efficiently and effectively to secure continuous improvement.
- 3.2 To meet this responsibility, the Council puts in place proper governance arrangements for overseeing what it does including putting in place proper arrangements for the governance of its affairs including risk management, the requirements of regulations and ensuring the effective exercise of its functions. These arrangements are intended to make sure that the Council does the right things, in the right way, for the right people, in a timely, open and accountable manner. The Council takes into consideration all systems, processes, policies, cultures and values that direct and control the way in which we work and through which we account, engage and lead our communities.

4. The Governance Framework

- 4.1 The governance framework allows the Council to monitor how they are achieving their strategic aims and ambitions and how this contributes to the delivery of its vision, priorities and values:



- 4.2 The system of internal control is a significant part of that framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve priorities and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness. The system of internal control is based on an on-going process designed to appropriately identify, quantify and manage the risks to the achievement of the Council's priorities, objectives and policies.

5. Review of Effectiveness

- 5.1 Telford & Wrekin Council has responsibility for conducting, at least annually, a review of the effectiveness of the governance arrangements including the system of internal control. The review of the effectiveness is informed by:-



5.2 The Council has faced continued challenges during 2023/24 particularly in respect to the ongoing financial constraints it is working within coupled with rising costs that has been experienced nationally. The Council has met this challenge and continues to deliver services against the backdrop of realising considerable savings.

5.3 The Council recognises the ongoing importance of information governance and formalised its Information Governance Framework. The main focus of the Information Governance Team in 2023/24 has been to:

- Ensure the Council’s continued compliance with the requirements of the UK Data Protection Act/UK General Data Protection Regulations (GDPR) 2018
- Updating relevant training, policies and procedures
- Managing risks associated with the implementation of new systems
- Facilitating appropriate and secure information sharing where there is a legal basis to do so
- Support on the prevention and investigation of data breaches

In addition, the Information Governance Team supported the implementation of a new secure email system called Zivver. This system will help reduce data incidents relating to email use.

The Information Governance Team has continued to report to the Audit Committee and Senior Management Team during the year including information on responses to information rights requests and data security breaches. During 2023/24 no enforcement action has been taken by the Information Commissioner’s Office (ICO) against the Council in respect to data breaches.

5.4 The Chief Executive, Executive Directors, Directors and Service Delivery Managers have signed annual assurance certificates confirming that the governance framework has been

operating within their areas of responsibility, subject to the actions outlined in Annex 1. Internal Audit plan to undertake sample testing of completed certificates to provide additional assurance that adequate controls/risk management measures have been operating in 2023/24.

5.5 The Accounts and Audit Regulations 2015 require a review of the effectiveness of the system of internal control. This review is informed by the work of Internal Audit, management, other internal assurance services and the External Auditors' review. The Internal Audit Annual Report 2023/2024 will set out the Internal Audit opinion.

5.6 The Council has been advised on the implications of the review of the effectiveness of the governance framework by Cabinet, Standards Committee, Audit Committee, Scrutiny, Senior Managers, Internal Audit and external review. The Chief Internal Auditor concludes that the review of the governance arrangements **provides a reasonable level of assurance** that these arrangements continue to be regarded as fit for purpose in accordance with the governance framework.

Internal Audit Work

One of Internal Audits key objectives, as detailed in the Internal Audit Charter is *'To review the effectiveness of the governance, risk management and control processes of the Council to aid improvement, provide a level of assurance and an opinion on them to the Council.'*

The work of Internal Audit is based on risk and the scope of each audit assignment, as a minimum, includes assessment of the governance, risk management and control arrangements put in place by management.

Despite some resource challenges, Internal Audit work have completed 90% (22/23 - 82%) of the revised risk based Annual Internal Audit Plan.

Internal Audit have ensured the Chair/Audit Committee and Senior Management Team have been kept informed of audit resource/work throughout the year.

Other Sources of Assurance

As stated above, reliance has been placed on other sources of assurance in 2023/24 with respect to the Chief Internal Auditors opinion. Other sources of assurance have been obtained from in year activity but also by reflecting on past opinions and the basis of these.

2023/24 has seen the Council consistently recognised as a well performing Council by a number of external bodies. Below is a summary of the recognition received.

- CQC inspection of special educational needs and/or disabilities (SEND) services – the outcome stated that Telford & Wrekin Council's services typically lead to positive experiences and outcomes for children and young people with SEND and that the local area partnership is taking action where improvements are needed. This was the highest possible outcome.
- Customer Contact Centre won the Best Efficiency and Transformation APSE national award.
- Telford was awarded Tree City of the World status by the United Nations for forestry practices.

- The Council were awarded a record six Green Flags for its borough's parks and green spaces.
- The Council are ranked in the top 10 of the Green Cities of England index

In addition, assurance has been provided by the following:

- Telford & Wrekin Council has a sound track record in respect to how it is run. This is important to note and is reflected in the 2021/22 audit opinion given and expected 2022/23 audit opinion as briefed by the External Auditors.

It is noted that there has been a delay in signing off the 2021/22 and 2022/23 accounts due to the External Auditor's resourcing challenges. This is a national issue and is no reflection on the standard and/or accuracy of the Council's financial statements for these years.

- General risk management identifies 'likelihood' as a key determinant of the level of risk associated with an action/entity. Given that the Councils track record demonstrates strong governance arrangements and sound financial management, the likelihood of this changing considerably in the space of 12 months is relatively low.
- Other examples of assurance obtained in year include:
 - Regular internal quality monitoring activity across many services
 - Family model peer review
 - Regular benchmarking undertaken in Adult Social Care
 - Legal Services Lexcel accreditation
 - Completion of statutory returns, VAT returns, and grant claims, etc.
 - Regular IT penetration testing and security auditing
 - Completion of performance development discussions with staff
 - Regular performance, contract and financial monitoring
 - Completion of required learning mandatory training
 - Inspection by the Investigatory Powers Commissioner's Office
 - Scrutiny reviews
 - Performance dashboards and OFLOG analysis of Council performance
 - IITCSE recommendation implementation and further assessment by independent chair
 - Regular financial reporting to SMT and Cabinet

Assurance obtained by reflecting on the past 3 years includes:

- The Chief Internal Auditors opinion has been that there a reasonable level of assurance that the governance arrangements continue to be regarded as fit for purpose in accordance with the governance framework.
- The External Auditor has stated that:
 - Final accounts have been produced on time and in line with best practice
 - An unqualified opinion has been given in the financial statements audited
 - Financial statements comply with statutory requirements
 - Financial statements give a true and fair view of the Councils financial position

- Proper arrangements are in place for securing economy, efficiency and effectiveness in its use of resources

In the Chief Internal Auditors opinion, the above assurance activity reflects that sound governance arrangements are in place as a number of the points above would not have been possible without adequate governance foundations being in place and embedded.

There has been no significant instances of fraud, poor risk management, poor financial management, etc. that would lead the Chief Internal Auditor to believe poor governance practices have been in place.

However, as part of the AGS certification process, there have been areas identified that do require development. Attached as Annex 1 is an agreed action plan to address these areas for development and ensure continuous improvement.

5.7 Issues from the previous action plan (2022/23) that have been addressed or mainstreamed have been deleted and those that continue to be addressed are included in 2023/24 action plan.

5.8 The Senior Management Team has monitored implementation of the 2022/23 actions and reported back to the Audit Committee in January 2024.

5.9 Detailed below is a statement explaining how the Council has complied with the Code of Corporate Governance and meets the requirements of the Accounts and Audit Regulations 2015 and CIPFA Code on the Principles of Good Governance.

5.10 Behaving with integrity, demonstrating strong commitment to ethical values and respecting the rule of the law.

5.10.1 Members and officers, in the main, recognise the importance of compliance with the Constitution, specifically Financial and Contract Rules; Procurement Regulations, Scheme of Delegation, Codes of Conduct and Gifts & Hospitality Policy. However, some improvements are needed in this area and recommendations have been included in the 2023/24 AGS action plan.

5.10.2 There is ongoing training, both classroom based and via the on-line learning platform (OLLIE) for Codes of Conduct, Equality Awareness, Leadership & Governance and Contract Procedure Rules/Procurement.

5.10.3 The Council has an Anti-Fraud & Corruption Policy, supported by the Whistleblowing (Speak Up) Policy, encouraging internal referrals. The Council has a zero-tolerance policy in relation to fraud and corruption and it is service management's responsibility to ensure there are adequate controls in their areas to ensure the opportunities for fraud are minimised. It is everyone's responsibility to report suspicions and the Whistleblowing (Speak Up) Policy supports this internally. Internal Audit along with the Investigations Team undertakes proactive fraud work based on a fraud risk register and/or other intelligence. Other specific anti-fraud and corruption activities are undertaken by Trading Standards. An annual report on anti-fraud and corruption activities and an update to the Anti-Fraud & Corruption Policy and Whistleblowing (Speak Up) Policy is presented to the Audit Committee.

5.10.4 Officers comply with their professional organisations' codes of conduct when delivering services.

5.10.5 All Internal Audit reviews consist of an ethics questionnaire that is sent to a sample of staff in specific teams to demonstrate their understanding of key corporate policies.

Ethics questionnaire findings have been shared when discussing individual audits with relevant Service Delivery Managers and Directors and taken to SMT as part of reporting corporate recommendations. Identified improvements required highlighted from findings from the ethics work have been included in the 2023/24 AGS action plan.

5.10.6 There are both internal and external reviews in social care to monitor compliance with the law, e.g. the Care Act, Deprivation of Liberties, Safeguarding and the Mental Health Act.

5.10.7 Human Resource and recruitment policies and processes ensure the Council is fully compliant with employment law. Annual audits are undertaken in these areas and ongoing checks take place to ensure compliance with IR35 legislation.

5.10.8 Senior officers meet regularly and work closely with Members to ensure that they understand and can undertake their respective roles effectively and legally.

5.10.9 The Cabinet monitors the effectiveness of the governance framework through the consideration of regular service and financial management information reports from senior management. Individual Cabinet Members receive regular feedback from senior officers in respect to their areas of responsibility on the progress of priorities and objectives. Issues of strategic and corporate importance are referred to Cabinet.

5.10.10 Statutory responsibilities across the Council are discharged openly and proactively, examples include having key statutory officers in place, i.e. Head of Paid Service, Data Protection Officer, Section 151 Officer, Monitoring Officer, Director of Children Services, Director of Adult Social Services, Director of Public Health and Scrutiny Officer.

5.11 Ensuring openness and comprehensive stakeholder engagement

5.11.1 The Executive Director for Housing, Communities & Customer Services is leading on the development of a new 10 year vision for the Borough that is being developed with key strategic partners. Development work is progressing including resident and partner engagement.

5.11.2 The Council actively contributes to, and collaborates with, partners to promote good governance and achieve the delivery of outcomes through increased joint working. The Council is a member of a number of sub regional partnerships and groups. Many of our services are delivered in partnership with other organisations such as West Mercia Energy, Town and Parish Councils, voluntary groups, etc.

5.11.3 Regular meetings take place between Children Safeguarding and key partner agencies such as the police, Telford & Wrekin CCG, Education and Health.

5.11.4 All Council services feed into transparent reporting processes through council committee meetings and this is further supported by the transparency agenda.

5.11.5 Annually the public is consulted on the budget for the forthcoming year.

5.11.6 There is regular engagement between Public Health, Telford & Wrekin Clinical Commissioning Group (CCG) and Social Care for the future provision of services.

5.11.7 The Scrutiny provision has looked at the development of policy, the decision-making process and areas of concern. The subject areas for review will be informed by community

engagement, direct feedback to members from within the community, the results of review and inspection (both external and internal) and areas of policy being developed by the Council.

5.12 Defining outcomes in terms of sustainable economic, social and environmental benefits.

- 5.12.1 The Council Plan was refreshed in 2022. The plan identifies 5 priorities to deliver the Council's organisational vision to 'Protect, Care and Invest to Create a Better Borough'. The Council continues to develop commercial projects to generate income to invest in front line services to mitigate the impact of Government cuts and uncertainty over Government funding.
- 5.12.2 Digital transformation and changes in the way we work are intrinsic to the Council's service delivery model.
- 5.12.3 The Telford & Wrekin Local Plan sets out the Council's vision and strategy for the physical planning of the borough up to 2031. The Council are currently undertaking a review of the Local Plan and have recently completed the Draft Plan consultation exercise. A further period of engagement will be undertaken prior to the plan being submitted to the Government's Planning Inspectorate for independent examination.
- 5.12.4 All service areas have their own service plans which details how they intend to deliver their service for the coming year and the risks they face. These plans encompass identifying barriers to service objectives being met.
- 5.12.5 The Council has a commercial strategy / investment strategy that demonstrates clear visions, objectives and outcomes. This includes financial, economic, social and environmental issues.
- 5.12.6 The Council's economic growth strategy supports and drives increased economic productivity.
- 5.12.7 The financial strategy sets out the short and long-term implications for service delivery across the Council. The Service & Financial Planning reports include various papers to Cabinet regarding the budget and sets out short/ medium and long-term implications, including the capital strategy and saving strategy.
- 5.12.8 Adult Social Services, in respect of financial management and the implementation of the cost improvement plan, have continued to provide updates during the year to SMT and Members.
- 5.12.9 All Council reports to Members show relevant financial implications and risk.
- 5.12.10 Implementation of the ICT Strategy has continued, including infrastructure upgrades, the ongoing roll-out of Office 365/applications and further security improvements particularly in response to spam, phishing/ whaling and ransomware threats.
- 5.12.11 The Council has implemented a number of climate actions which contribute to its aim of becoming carbon neutral by 2030 and its commitment to remove single use plastics from the Council's operations and activities by 2023.

Tackling climate change is one of the five priorities set out in the current Council Plan. Throughout its partnerships, the Council is also playing its part in helping the wider borough to achieve the same targets the Council has set for itself.

Key actions have included:

- The Council has achieved an overall reduction of 60% in CO2 emissions from a baseline of 2018/19
- Reduction of 14% in gas usage across the Council's operational estate
- The Office of Zero Emission Vehicles (OZEV) awarded the Council £683,370 from the On-Street Residential Charge Point fund for the installation of 70 EV charge points across 21 Council car parks
- OZEV award of £1,020,000 to increase the number of on-street EV charge points
- An additional 6 electric vehicles have been purchased
- Publication of the Council's Climate Change Supplementary Planning Document

5.13 Determining the interventions necessary to optimise the achievement of the intended outcome.

5.13.1 The 2022/23 Service & Financial Strategy including the Treasury Management Plan are aligned to the refreshed Council Plan – setting out how our financial resources will deliver the Council vision and priorities.

5.13.2 Budget plans are produced for all service areas for planning purposes. Budget consultation is undertaken annually with Council Members and members of the public.

5.14 Developing the Council's capacity, including the capability of its leadership and the individuals within it.

5.14.1 The Workforce Strategy was approved in 2021 and is available to all employees on our intranet. The strategy has 5 priorities which were informed by the results of the employee survey and consists of the following priorities:

- Our workforce will have the skills and abilities to deliver our priorities and will have the opportunity to further develop
- Our managers will be leaders and will empower staff to deliver our priorities
- Our organisation will be more diverse and inclusive offering a voice and fair treatment for all
- Our workplace will be healthy and we will support our employee's wellbeing
- Our employment package will be attractive that offers (and will offer) fair terms and conditions

Work is underway to review and refresh the current workforce strategy to be launched in 2024. An employee survey will also be undertaken in Autumn 2024.

5.14.2 Officers understand their respective roles and these are set out in job descriptions. The Constitution, Scheme of Delegation and Contract Procedure Rules clearly shows roles and responsibilities, specifically with regard to delegation and authorisation.

5.14.3 There are various training methods available to staff such as mentoring, Ollie (On-line learning platform) and virtual face to face. A new leadership and management programme launched in January 2022 for the SMT cohort. The SDM cohort launched in May 2022 and in the autumn for Team Leaders. Work is also underway to work with Directors to look at opportunities for apprenticeships in their areas to meet service needs, this includes upskill as well as new recruits.

- 5.14.4 Other support includes CPD sessions, team meetings and ongoing 1:2:1s, however results of the ethics questionnaires have demonstrated that a small number of staff still do not have regular 1:2:1 supervision meetings.
- 5.14.5 Members receive an induction session and annual training with regard to the Treasury Management Strategy and other training relevant to their position. All Members and staff have had the opportunity to undertake training on General Data Protection Regulations (GDPR) / Data Protection Act (DPA) 2018 legislation. There is also online training available to all staff on GDPR/DPA 18 Requirements.
- 5.14.6 The action plan at Appendix A of this statement detail issues highlighted from the results of the annual governance certification process

5.15 The Council continues to manage risks and performance through robust internal control and strong public financial management.

- 5.15.1 Risk management is an integral part of good management and corporate governance and is therefore at the heart of what we do. Our approach to managing risk is explained in our Risk Management Strategy. The Strategic Risk Register is reviewed by SMT and considered by Audit Committee, as a minimum, 4 times a year.
- 5.15.2 Updated governance on risk management was agreed and introduced in 2023/24. This included a new Risk Management Framework, Risk Management Strategy (approved by the Audit Committee) and Risk Management Policy.
- 5.15.2 The Internal Audit plan is informed by the Council's service and financial planning processes, strategic risk register, external inspection reports, external networking intelligence, comments from Senior Management and their opinion of the current state of the governance risk and internal control arrangements.
- 5.15.3 During 2023/24 the Internal Audit team achieved 90% of their revised planned work and this has been used, in part, with the relevant output from unplanned work to help form their opinion on the adequacy and effectiveness of the Council's governance, risk management and internal control framework.

All recommendations made in audit reports show a risk category which is used to inform the overall grading of the report.

- 5.15.4 The Chief Internal Auditor has undertaken checks on the work of Internal Audit as part of the Quality Assurance Improvement Program. A small number of minor issues have been identified through these checks and have been fed back to the Internal Audit Team to assist in their continuous improvement.
- 5.15.5 Internal Audit report to the Audit Committee 4 times a year. The Audit Committee has asked for additional information during the year to provide assurance on the management of risks and implementation of recommendations. The Audit Committee have also approved the Internal Audit Charter for 2023/24.
- 5.15.6 Large projects include the maintenance of a project risk register; this is an ongoing working document that is amended throughout the project. Where personal data is processed, projects also include the completion of Data Protection Impact Assessments.

- 5.15.7 The Council has adopted the CIPFA code of practice for managing the risk of fraud and corruption and this has been reflected in our updated Anti-Fraud & Corruption Policy and Whistleblowing (Speak Up) Policy.
- 5.15.8 Services report regularly to Council committees such as Audit Committee, Planning, Licensing, Cabinet etc. These reports detail any impact assessment, including risk and opportunity. Financial decisions are reported to Cabinet, full Council and Audit Committee, who often challenge to ensure appropriate financial management and to demonstrate transparency.
- 5.15.9 Financial Regulations set out our financial management framework for ensuring we make the best use of the money we have available. Financial roles and responsibilities are clearly shown in the Financial Regulations and it provides a framework for financial decision-making.
- 5.15.10 The Treasury Management Strategy and regular updates on treasury matters are provided to Audit Committee. This information clearly show investments, loans, and the financial position of the Council. The Council's Treasury Management advisors are Link Treasury Services.
- 5.15.11 The Council's financial strategy identifies the short term budget plan and long term aspirational plan linked to the corporate plan to be a self-sustaining council.
- 5.15.12 The Council complies with the Principles and Standards set out in the CIPFA Financial Management Code appropriately and proportionately demonstrating sound financial management and providing the expected assurance.
- 5.15.13 The Council's External Auditors have not completed their report for 2022/23. However, the S151 Officer and Audit & Governance Lead Manager (Chief Internal Auditor) have met with External Auditors periodically throughout 2023/24 and the External Auditors have commented that they do not expect to report any problems with the final accounts.

Therefore, the expectation is that the External Auditors opinion will mirror the opinion for 2020/21 which stated:

“Value for Money conclusion - Based on the work we performed to address the significant risk we identified, we are satisfied that the Council has proper arrangements for securing economy, efficiency, and effectiveness in its use of resources”

An unqualified audit opinion was, once again, received by the Council in respect of 2021/22.

- 5.15.14 The Council has continued to make savings in the light of ongoing financial pressures. £156.9m of ongoing savings will have been delivered by the end of 2023/24 with a further £15.8m to be delivered by the end of 2024/25. Forecasts of the level of savings that will be required from April 2025 onwards are very difficult to make in the absence of any Government funding settlement information beyond the 31 March 2025.

The Government have stated that there will be no changes to the local government finance system until after the next general election which means it is likely that local government will yet again receive a one year funding settlement for 2025/26. The Council will continue to face a very challenging financial outlook for the foreseeable future.

5.16 Implement good practices in transparency, reporting and audit to deliver effective accountability

- 5.16.1 As a public body we endeavour to be open and transparent in our activities and reporting. Council and committee agendas, reports and minutes are published on our corporate website to demonstrate decisions made. The Council undertake public consultation on areas such as the budget. We publish expenditure over £100 on our website, as part of the transparency agenda.
- 5.16.2 The Audit Committee has responsibility for internal and external audit matters, the Council's arrangements for corporate governance and risk management.
- 5.16.3 In 2023/24, Telford and Wrekin Council continued to be the lead authority for the West Midlands Audit Committee Chairs Forum (WMAACCF). The Council's Chairperson of the Audit Committee is also the Chairperson of the WMAACCF. The WMAACCF is sponsored by the Local Government Association and is a forum where Audit Committee Chair's from across the West Midlands meet to share good practice.
- 5.16.4 The Audit Committee terms of reference also incorporate the review and monitoring of the Council's Treasury Management arrangements. Members of the Committee are kept up to date through awareness training on factors that influence/affect delivery of the strategy and during the year were provided with an update on these matters by Link Treasury Services, the Council's Treasury Management advisors.
- 5.16.5 There are various committees, all with their own terms of reference and areas of responsibility, i.e. Licensing Committee, Planning Committee, and there are elected members who are responsible for service areas within the Council.
- 5.16.6 Arrangements are in place to ensure Internal Audit fully complies with the Public Sector Internal Audit Standards (PSIAS). A self-assessment of the Internal Audit function against the requirements of the PSIAS was undertaken in 2021/22 and is due to be repeated in 2024/25.
- 5.16.7 The Internal Audit plan is developed using a risk-based approach taking into consideration the Strategic Risk Register, Service Plans and other audit intelligence. Audit recommendations made are communicated to relevant Service Delivery Managers and relevant Senior Management representatives for consideration and implementation of recommendations. Internal Audit will share best practice in the duty of their work. The Audit plan is reviewed regularly to ensure it is still relevant and any changes made are reported to the Audit Committee.
- 5.16.8 The Council's Communication Team works with Officers and Members to ensure key messages are easy to understand and in accessible formats to meet the diverse needs of our borough.
- 5.16.9 The Council's performance management framework is monitored by the Senior Management Team and has procedures in place that drive continuous improvement in performance. More robust reporting has taken place during 2023/24.
- 5.16.10 The Council has identified lessons learnt from corporate complaints and complaints made to the Local Government Ombudsman and implemented measures accordingly.

David Sidaway
Chief Executive

Cllr Shaun Davies
Leader of the Council

Cllr Angela McClements
Chair of Audit Committee

Signed	Dated

AGS ACTION PLAN FOR 2023/24 FOR IMPLEMENTATION DURING 2024/25

No	Findings	Actions	Lead Officers	Additional comments
1.	<p>Ongoing savings proposals, budget constraints and continued strategic management of organisational changes.</p> <p><i>Ongoing from previous AGS</i></p>	<p>Continued management/reduction of budgets, revised structures and commercial/business approach which links to the continued development and implementation of revised governance framework.</p> <p>Further consultations on future savings where necessary.</p>	<ul style="list-style-type: none"> • Chief Executive • SMT 	
<p>Page 29</p> <p>2.</p>	<p>All internal audits consist of an ethics questionnaire that is sent to a sample of staff in the team/areas being audited to demonstrate their understanding of corporate policies and whether staff feel supported.</p> <p>In a small number of responses returned it was noted that:</p> <ul style="list-style-type: none"> • <u>Some</u> staff had not completed their essential learning • <u>Some</u> staff could have a better awareness of some corporate policies. 	<p>Reports to SMT detailing levels of essential learning completion to continue.</p> <p>Investigation Team to re-publicise fraud related training on Ollie and will monitor levels of completion.</p>	<ul style="list-style-type: none"> • SMT/SDM • Policy & Development Manager • Audit & Governance Lead Manager 	

No	Findings	Actions	Lead Officers	Additional comments
	<p>These findings have been shared when discussing individual audit reports with relevant SDM's and Directors and taken to SMT as part of reporting corporate recommendations.</p>			
<p>3.</p>	<p>The results of the annual governance certification process highlighted that there had been some reduction in the numbers of appropriately skilled staff in some service areas although some areas had identified ways to address and overcome this. Recruitment of staff in local government, particularly in some professions, has proven challenging for some years and this has resulted in potential single points of failure or the use of temporary staff.</p> <p>It was clear, however, that Service Deliver Managers are aware of these challenges and, largely, were putting measures in place to address any capacity challenges utilising the workforce planning process to do so. In addition, some areas were looking to utilise the apprenticeship scheme to</p>	<p>The Council has a number of initiatives in place including service and workforce planning, apprenticeship scheme, etc to support managers in addressing any areas of concern. These measures have been in place for some years as a response to the recruitment challenges facing the local government sector with particular success in use of the apprenticeship scheme to upskill existing staff to fill critical roles.</p> <p>The Organisational Development Team have introduced new Leadership & Management training and learning programme for all staff (from Team Leaders to Senior Management Team) who have any management responsibility to further support their development and to enable some resilience planning within the Council. This course commenced in 2023 and is continuing throughout 2024.</p>	<ul style="list-style-type: none"> • Chief Executive • Director of Finance & Human Resources • Policy & Development Manager 	

No	Findings	Actions	Lead Officers	Additional comments
	<p>upskill existing staff in order to address the reduction of skilled staff.</p> <p><i>Ongoing from previous AGS</i></p>	<p>Additional recruiting measures being used via social media platforms with more straightforward application processes being adopted in areas of high volume.</p> <p>The Skills and Apprenticeship Show was also utilised to support recruitment into roles with high staff numbers such as catering and cleaning.</p> <p>Continued improvements to recruitment materials and recruitment processes to remove any barriers to potential applicants.</p>		

This page is intentionally left blank



Telford & Wrekin
Co-operative Council

Protect, care and invest
to create a better borough

Borough of Telford and Wrekin

Cabinet

16 May 2024

New complaint handling code and combined complaint policy

Cabinet Member:	Cllr Nathan England: Cabinet Member: Finance, Customer Services & Governance
Lead Director:	Felicity Mercer: Director: Communities, Customer and Commercial Services
Service Area:	Council Wide
Report Author:	Lee Higgins: Delivery Manager: Customer Relationship & Financial Welfare Services
Officer Contact Details:	Tel: 01952 383835 Email: lee.higgins@telford.gov.uk
Wards Affected:	All Wards
Key Decision:	Not Key Decision
Forward Plan:	Not applicable
Report considered by:	SMT – 16 April 2024 Business Briefing – 25 April 2024 Cabinet – 16 May 2024

1.0 Recommendations for decision/noting:

- 1.1 That Cabinet notes the introduction of the new complaint handling code issued by the Local Government and Social Care Ombudsman and the Housing Ombudsman Service and the Council's plans to ensure compliance with the code, despite the additional pressure and burden this will place on Council services.
- 1.2 That Cabinet approves the changes to the new Complaints Policy which is attached at Appendix A. This policy will be introduced with immediate effect.

- 1.3 That Cabinet grants delegated authority to the Director for Communities, Customer & Commercial Services in consultation with the Lead Cabinet Member for Finance, Customer Service & Governance to make amendments to this policy going forward in line with changes to the appropriate legislation or policy.

2.0 Purpose of Report

- 2.1 The purpose of this report is to outline the requirements of the new complaint handling code of conduct that is being introduced by the Local Government and Social Care Ombudsman (LGSCO) and the Housing Ombudsman Service (HOS) from the 1st April 2024.
- 2.2 The report also highlights the changes to working practices that will need to be introduced across the organisation to ensure compliance with the code, including new, shorter complaint handling timescales and the requirement to undertake annual self-assessments of our compliance with the code. We must be compliant with the HOS code by the 1st April 2024, and compliant with the LGSCO code by the time they start reviewing compliance as part of their casework in 2026/27.
- 2.3 As part of these changes, we are required to combine the existing corporate complaints policy, complaints policy for council tenants, and the policy for complaints involving Child Sexual Exploitation (CSE) into a single policy by 1st April 2024. Our existing statutory complaints policies for Adult Social Care and Children's Services will remain as separate policies with their own specific timescales.

3.0 Background

- 3.1 Last autumn, the Local Government and Social Care Ombudsman (LGSCO) undertook a consultation on the proposal to introduce a new complaint handling code in relation to Local Government complaints and complaints to the Housing Ombudsman Service (HOS). The HOS complaints code affects council tenants for whom we are the registered provider.
- 3.2 We provided a detailed and robust response to the consultation which highlighted a number of significant concerns we had regarding the impact of the proposals on resources, particularly in light of the pressure that Local Government is currently under. We also contributed to a response to the consultation that was submitted by the Local Government Association, which also expressed similar concerns.
- 3.3 On the 8th February 2024, the LGSCO released their conclusion to the consultation, and announced their intention to introduce a new code from the 1st April 2024. The consultation did make some changes to the proposed code, although many of our core concerns regarding the additional pressure this would place on the workloads of Local Authorities were not addressed.
- 3.4 The LGSCO do not intend on considering the code as part of their casework processes until 2026/27 at the earliest. However, tenant complaints will need to comply with the HOS code immediately (1st April 2024) which means that a single policy for all complaints needs to be in place by this date to comply with the statutory code of the HOS, or as soon as possible.

- 3.5 The LGSCO code is intended as advice and guidance for councils not instructions, however, they will make a maladministration finding where Councils depart from the code without sufficient explanation on cases as a whole, but also on individual cases. This will be via their individual case reports but in some cases they may issue a public report if a council is found to not be complying.
- 3.6 The HOS code is statutory. Non-compliance with the code may lead to the HOS issuing a complaint handling failure order (CHFO).
- 3.7 The LGSCO have invited us to take part in a pilot of the new code, which will allow us to have an opportunity to influence development of the new guidance for Local Authorities and the oversight and governance arrangements of the LGSCO when compliance of the new code becomes mandatory from 2026/27.

4.0 Summary of main proposals

- 4.1 The main elements of the new code are:

Element of new code:	TWC current position:	Impact and proposed response/action (where appropriate):
Organisations should have designated sufficient resource assigned to take responsibility for complaint handling, including liaison with the relevant Ombudsman. Organisations are expected to prioritise complaint handling and a culture of learning from complaints.	We do have dedicated resource to handle complaints, and we believe we do have a culture of learning from complaints, as evidenced by our published annual customer feedback reports.	No additional actions proposed.
Stage 1- Complaints should be acknowledged in 5 working days,	It is for each Local Authority to set its own complaint handling timescales. The Customer Relationship Team have a current target of acknowledging complaints within 2 working days of receipt.	The proposal would be for this to be implemented immediately for all complaints to allow for this to be firmly embedded in the organisation's procedures before 2026/27. Also allowing time to reduce the average working days to respond at Stage 1 before we are monitored in this area.

<p>A full response to the stage 1 complaint should be provided within 10 days of the complaint being acknowledged.</p> <p>Timescales can be extended by 10 working days but there must be a good reason for this which should be explained to the individual.</p> <p>As part of HOS compliance, we will need to detail all cases that fall outside of the 20 working day timescale within our annual self-assessment.</p> <p>The LGSCO will also expect this level of compliance from 2026/27 when we have to start to publish a self-assessment for non-housing related complaints.</p>	<p>Stage 1 response timescales are currently 15 working days,</p> <p>Stage 1 responses can be extended to 20 working days with good reason.</p> <p>Our current average response time is 12 working days.</p>	<p>Please also note that any individual cases that do not comply with the timescales will need to be detailed in the annual self-assessment under the comply or explain principles.</p>
<p>Stage 2-</p> <p>Should be acknowledged within 5 working days. Individuals should not be required to explain reasons for requesting a stage 2.</p> <p>Organisations should make reasonable efforts to understand why an individual remains unhappy.</p> <p>A full response should be provided within 20 working days of the complaint being acknowledged.</p> <p>This can be extended by a further 20 working days if</p>	<p>Our current stage 2 response timescale is 25 working days, which can be extended to 65 working days with good reason.</p> <p>Our current average response time is 34 working days.</p>	<p>Stage 2's are independently investigated and responded to by the Customer Relationship Team.</p>

New complaint handling code and combined complaint policy

<p>there is good reason and this should be explained to the individual.</p>		
<p>Organisations should have a single policy for dealing with complaints covered by the code. Adult Social Care and Children’s Services Statutory complaints are excluded. However, the expectation is that the council tenant complaints process and CSE process will be combined within the corporate procedure.</p>	<p>We currently have three separate complaint handling policies: corporate complaints policy, complaints policy for council tenants, and the policy for complaints involving Child Sexual Exploitation (CSE). These were only refreshed in 2023.</p>	<p>We now need to have a single policy written and approved to comply with the HOS code. Please see Appendix A for approval.</p>
<p>New definitions of ‘service request’ and ‘complaint’ have been provided. They have said that service requests should be recorded and monitored and reviewed regularly.</p>	<p>The majority of service requests are already reported and monitored through our Customer Relationship Management and other systems, so this element should not involve much additional work for us.</p>	<p>This definition is helpful. Although we are already distinguishing between service requests and complaints in the manner which the new code suggests, our approach was queried during the LGA Peer Review of Customer Services which took place in May 2021 when it was suggested that first requests for action, such a report of a pothole, should be treated as a complaint.</p>
<p>It is essential to ensure that all aspects of a complaint are responded to in full in the stage 1 response. If any element is not responded to at stage 1, then the complainant has the right for those missing elements to be considered at stage 2. Complaint responses must also clearly contain each of the following elements:</p>	<p>Currently, services develop their own responses to complaints and there is no fixed template to ensure that all of these areas are covered in the responses.</p>	<p>A new complaint response template has been designed for use by service areas, to ensure that every aspect of the complaint response has been addressed in full.</p>

New complaint handling code and combined complaint policy

<ul style="list-style-type: none"> ▪ Complaint stage ▪ Complaint definition ▪ Decision on the complaint ▪ Reason for the decision ▪ Remedy ▪ Outstanding actions ▪ How to escalate 		
<p>LGSCO have agreed that MP and Councillor enquiries can be dealt with as 'service requests' even when they contain an expression of dissatisfaction, however it would be good practice in the response to signpost MPs and Councillors to the complaints procedure if they remain dissatisfied.</p>	<p>This is a positive outcome as the initial proposal in the consultation was that these were all included in the complaint procedure.</p>	<p>Proposed action is to brief officers who respond to MP and Councillor enquiries to include a paragraph to signpost them to the complaints procedure if they are dissatisfied with the response they have received. A paragraph will also be included in the allocation emails for MP and councillor enquiries.</p>
<p>Outstanding actions identified through the complaints process should be tracked and actioned promptly, with appropriate updates provided to the individual.</p> <p>We will be required to evidence this as part of the annual self-assessment.</p>	<p>This not something that is currently undertaken. It is assumed by the Customer Relationship Team that each service area will complete any actions that they have promised to a customer. This change would require the CR Team to progress chase each service area for an update on the completion of all actions promised as part of a complaint, record these on our system so that we can report to the LGSCO/HOS in the annual self-assessment and ensure that an update is provided to the customer. This has the potential to require significantly more resource.</p>	<p>Managers of services to continue to monitor delivery of actions included within stage 1 complaint responses. CR team to monitor delivery of actions in Stage 2 complaints.</p> <p>Service managers will need to monitor progress against agreed actions and provide this evidence to the CR Team annually as part of the self-assessment.</p>
<p>Where an organisation asks for feedback about its services through a</p>	<p>This not something that is routinely included in surveys.</p>	<p>Service areas have now been asked to ensure that this wording is added to</p>

<p>survey, it should provide details of how individuals can complain so they can pursue any dissatisfaction if they so wish.</p>		<p>any future surveys that are issued.</p>
<p>A new requirement has been introduced for an annual self-assessment to be completed with evidence to demonstrate how the organisation follows the code and its own policies.</p>		<p>This is a significant new burden as two self-assessments will need to be completed each year with evidence of compliance. For HOS we MUST follow the code and complete a 24 page self-assessment including evidence. The HOS will assess compliance with the code across three areas, including scrutiny and oversight, compliance in policy, and compliance in practice in accordance with the Code Compliance Framework. From 2026/27 the LGSCO will expect that a separate self-assessment is completed for non-housing related complaints.</p>
<p>LGSCO intends to publish an accompanying guide on best practice for producing an annual complaints performance and service improvement report, including which data could be recorded and reported. There will also be a final guide for Council's published in 2024/25.</p>	<p>We already publish an annual customer feedback report which includes detailed analysis of complaint handling.</p>	<p>The LGSCO have asked for Councils to register their interest on working with them to develop these new guides. We have submitted our interest, whilst reiterating that we still have significant concerns about the additional pressure and burden that these new codes will place on Local Authority services.</p>

4.2 New combined Corporate Complaints, Compliments and Comments policy and procedure

4.2.1 The new policy, which is attached at Appendix A, combines the previous corporate complaints policy, council tenant complaints policy and policy for complaints involving CSE into a single policy and procedure.

New complaint handling code and combined complaint policy

4.2.2 The policy reflects the new timescales as outlined in the code, although we will only be expected to be meeting these for housing complaints initially.

4.2.3 We have also taken the opportunity to clarify the policy around restricted contact arrangements for vexatious and persistent complainants. Specifically,

- Where matters have previously been responded to, correspondence will be kept on file and not responded to.
- Any restrictions placed on contact due to unacceptable behaviour will be proportionate and demonstrate regard for the provisions of the Equality Act 2010 and;
- Where a person's attempts to circumvent the contact restrictions put in place under this policy we can and will make a decision based upon the evidence and, if necessary, extend the contact restrictions to other parties/ persons if judged appropriate.

4.2.4 The requirement for us to ensure we are adopting any learning points from complaints has also been reinforced in the new policy.

4.2.5 As the previous stand-alone policy regarding complaints relating to CSE was developed with consultees with lived experience, this new combined policy has also been shared with them for comment.

5.0 **Alternative Options**

5.1.0 The HOS code is statutory. Non-compliance with the code may lead to the HOS issuing a complaint handling failure order (CHFO) - Type 3. There are three types of failure orders that can be issued.

CHFO Type 1	Issued in relation to failings in an individual case, where the Ombudsman has taken reasonable steps to seek engagement from a landlord, but the resident remains unable to progress a complaint through the landlord's process
CHFO Type 2	Issued on an individual case where the landlord has failed to provide information, either at the outset of, or during, an investigation or to confirm compliance with our orders, to the Ombudsman as requested
CHFO Type 3	Issued following assessment by the Ombudsman through duty to monitor activities.

In all cases the Ombudsman will provide a landlord with details of the presenting issue and provide an opportunity for the landlord to rectify this before a complaint handling failure order is made.

The Ombudsman will publish details of CHFOs issued on a quarterly basis, including type, landlord names and whether the order was complied with. This information will also be reported to the Regulator for Social Housing.

5.2 The action specified in a complaint handling failure order could result in the Ombudsman taking further action such as referrals to the landlord's governing body or the Regulator of Social Housing, ordering the landlord to publish details of its failure to comply and/or publishing a special report on the landlord's non-compliance.

5.3 However, the LGSCO element of the code is purely guidance, so we do have options around how much additional resource we apply to meet the new requirements of this element of the code. We do have to complete an annual self-assessment within which will need to report any cases that have not complied with the code. The LGSCO may issue individual case reports but in some cases they may issue a public report if a council is found to not be complying.

6.0 Key Risks

6.1 Meeting the requirements of the new code will place additional pressure on Council resources, both in the Customer Relationship Team and the service areas who are responsible for investigating and responding to the complaints within these new timescales. However, failure to comply with the code could result in a maladministration finding from the LGSCO, or the issuing of a complaint handling failure order from the HOS.

7.0 Council Priorities

7.1 A community- focussed, innovative Council providing efficient, effective, and quality services.

Key outcome: Our customer experience is the best possible and facilities are accessible to all.

8.0 Financial Implications

8.1 Meeting the requirements of the new code will be met from within existing council resources as detailed in section 4.1 of the report. This will be funded from existing budgets.

9.2 Any future requirement for additional resource and any further financial implications will need to be considered as part of the Medium Term Financial Strategy.

9.0 Legal and HR Implications

9.1 The Council, as a Registered Provider, is required to comply with the Complaints Handling Code which has now been published by the Housing Ombudsman Service. Legal support has also been provided in development of the policies and will continue to be provided as necessary.

New complaint handling code and combined complaint policy

There are no additional HR implications aside from resource implications as detailed in this report.

10.0 Ward Implications

10.1 There are no specific ward implications from this report.

11.0 Health, Social and Economic Implications

11.1 There are no specific health, social or economic implications arising from this report.

12.0 Equality and Diversity Implications

12.1 All of the borough's customers and stakeholders will be impacted by the introduction of the new complaint handling code.

13.0 Climate Change and Environmental Implications

13.1 There are no climate change or environmental implications arising from this report.

14.0 Background Papers

[Complaint Handling Code - Local Government and Social Care Ombudsman](#)

[Complaint Handling Code | Housing Ombudsman Service \(housing-ombudsman.org.uk\)](#)

15.0 Appendices

15.1 Appendix A - Corporate Complaints Policy and Procedure 2024

16.0 Report Sign Off

Signed off by	Date sent	Date signed off	Initials
Legal	2/4/2024	10/4/2024	EH
Finance	2/4/2024	5/5/2024	PT



Telford & Wrekin
Co-operative Council

**Protect, care and invest
to create a better borough**

Resolving Complaints and Improving Services

Policy & Procedure for Corporate Complaints, Compliments & Comments

Contents:

Section 1- Scope of the Representations and Complaints Procedure	3
1 Defining representations and complaints	3
2 Our Policy on Complaints	4
3 What may be complained about?	6
4 Who can complain under this procedure?	6
5 What is excluded from this procedure?	7
Section 2- How the Process Works	10
6 How the process works	10
7 Putting things right	15
8 The Local Government and Social Care Ombudsman	16
9 Housing Ombudsman Service	16
10 Improving services following complaints	17
11 Unacceptable behaviour and vexatious complainants	18
12 Compliments and Comments	20
13 Performance monitoring	20
14 Corporate Complaints Flowchart	21
15 Complaints involving Child Sexual Exploitation (CSE)	22
16 Signposting to Advocacy and Support Services	23
Appendix A – How we respond to complaints involving Child Sexual Exploitation (CSE)	24

Section 1 – Scope of the Representations and Complaints Procedure

1. Defining representations and complaints

- 1.1 At Telford and Wrekin Council we welcome all feedback from customers, this is because it helps us improve the way we do things and to learn from things that have gone wrong.
- 1.2 The intention of this document is to set out the procedure for a customer or tenant who is likely to want to make representations, including complaints about, the actions, decisions of our services and to allow any other appropriate person to act on their behalf.
- 1.3 This policy and procedure on complaints, compliments and comments applies solely to feedback that sits outside of all statutory processes.
- 1.4 Complaints about the actions or decisions on the part of the Council in relation to Child Sexual Exploitation (CSE), will now be dealt with under this procedure. Please see Section 15 for further information around how we will handle complaints relating to this.
- 1.5 Any reference within this document to customers also references Telford and Wrekin Council tenants.
- 1.4 We define a complaint as

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

People can complain, where they believe the Council has:

- Failed to do something it should have done
- Behaved unfairly or discourteously
- Failed to carry out a service to a recognised standard
- Done something wrong
- Done something it should not have done

It is recognised that this definition does not cover every scenario and that complaints can range from major grievances to minor annoyances.

- 1.5 We realise that it would be unrealistic to register every such statement within the procedure, particularly in cases where it is possible to deal with the matter of concern there and then or where the concerns are a service request. However, you do not have to use the word ‘complaint’ for it to be treated as such.
- 1.6 It is nevertheless the complainant’s right ultimately to decide whether or not the matter of concern should be registered within this complaints procedure. It is crucial therefore that clear information about the procedure is made available in advance, so that complainants can make an informed decision about whether they want to make a complaint in line with this procedure.

- 1.7 Representations may not always be complaints; they might also be positive remarks or ideas that require a response from the Local Authority. Enquiries or comments about the availability, delivery or nature of a service which are not criticisms are also welcomed and can help us to improve our services.
- 1.8 It should be noted at the outset that those who are, or have been, victims of sexual abuse (which includes sexual exploitation) have the legal right to a greater level of confidentiality than others. This means that their details should not be shared with anyone else except as absolutely needed to deal with their complaint. If those dealing with any complaint are in any doubt as to whether or not details can be shared, they will seek advice from the Council's legal team.

2. Our Policy on Complaints

- 2.1 Customers of any service provided on or behalf of Telford & Wrekin Council should have access to a simple, well-publicised procedure common to all services.
- 2.2 The policy is framed to:
- Provide high quality and responsive service;
 - Acknowledge that all people who receive services have a right to complain if they think that something that should have been done has not been done, or that something has been done poorly or incorrectly.
- 2.3 We know that things can go wrong with services, and that staff and managers can make mistakes. When this happens, we believe it is important to put things right, as rapidly and as effectively as possible. Through this complaints procedure, we are committed to working with customers who use our services, their advocates, carers and relatives, listening to them and deciding with them, where possible, the most effective way of sorting out whatever has gone wrong, with a view to putting the customer back into the position they were in prior to any injustice occurring.
- 2.4 Above all, the way we deal with complaints will be based on
- Customer focus – listening to what people tell us
 - Responsiveness – acting on what people say to us
 - Promptness – making sure people get answers in good time
 - Transparency – dealing openly and honestly with problems
 - Proportionality – making sure that the resolution fits the complaint
 - Learning – making sure complaints result in changes and improvement, where appropriate

We are committed to:

- dealing with complaints and comments quickly and effectively; and
- using complaints, comments and compliments to review and improve our services

2.5 We recognise our responsibility to ensure the customer has a proportionate level of awareness of their entitlement to complain among people who use or may be eligible for services. We will therefore make sure, in a number of ways that people are well informed and reminded that the complaints procedure is available if necessary. Customers can expect assistance and support if they have cause to use it.

Among the ways in which we will meet this obligation are:

- Information about the complaints policy and process will be made available in a variety of ways;
 - On the Council website- www.telford.gov.uk/complaints.
 - Complaint leaflets will be available at our front facing buildings and also made available on request.
- Our customers will be given details by staff members in the course of their work.
- Case management correspondence will routinely incorporate references to the right to make complaints.
- A dedicated email address for complaints- customer.relationship@telford.gov.uk

2.6 This policy and procedure will be available to members of the public on the Council's website, but hard copies will be provided on request. The complaint leaflet 'Have your say' which summarises this information is widely distributed and is available at a range of community contact points, as well as from the Customer Relationship Team.

2.7 For this procedure to be of benefit, we think it is crucial for all customers to be well informed about how the complaints process works, so that everyone is aware of their rights and obligations. Recognising that we serve a diverse community, we will therefore make details of the procedure available on request in a range of formats, in order to maximise its accessibility and to ensure it remains inclusive.

2.8 Whenever we deal with a comment or a complaint, we will look critically at what has happened, to see what lessons we can learn and ensure that any changes which need to be made are applied. This not only applies to the case being complained about, but across the service. If we believe that something has gone wrong, then we need to put it right and to make sure that the customer has not lost out as a result. If when the investigation concludes the complaint was not justified, we will provide a full written explanation. In all cases, we will provide clear information about how to take matters further, so that the person making the complaint can decide if that is what they want to do.

2.9 We realise that the different procedures which could be applicable when concerns are raised about services (e.g. the complaints procedures of other bodies, a provider's own in-house complaints arrangements, disciplinary processes, criminal investigations etc.) could result in confusion for customers. In cases like this, complaints staff will ensure that there is consultation and engagement with complainants, and that sound decisions are reached with them about which procedure should take precedence, and why. We regard it as crucial however that people are provided with clear information about the possible interplay between different procedures and are reassured that they are entitled to request that any remaining issues can be taken up through this complaints process, once the other process is concluded.

- 2.10 We recognise that many people fear that making a complaint may result in reprisals or in a deterioration of the service provided, and so we offer an assurance that we would regard this as wholly unacceptable, and that we would take very seriously any concern that this had happened. We will work to ensure that all members of our staff and management have a positive and informed view of complaints, and will give whatever help is necessary to enable people to get due benefit from the procedure.
- 2.11 We also believe that when people who use our services send us comments and compliments based on their experiences, they should be acknowledged, considered and acted upon. This is an important aspect of the dialogue between local people and local services.

3. What may be complained about?

- 3.1 A complaint may arise as a result of many things relating to service functions such as:
- An unwelcome or disputed decision;
 - Concern about the quality or appropriateness of service;
 - Delay in decision making or provision of services;
 - Delivery or non-delivery of services including complaints procedures;
 - Quantity, frequency, change or cost of a service;
 - Attitude or behaviour of staff;
 - Policy and procedures

4. Who can complain under this procedure?

- 4.1 This procedure is open to everyone who lives, works or visits the Telford & Wrekin area or uses Telford and Wrekin Council services.

It is also open to Telford and Wrekin Council tenants. **Please Note:** This procedure does **not** cover complaints in relation to Wrekin Housing Group, which is a separate organisation to the council.

This procedure is also open to everyone who has been directly affected by the actions or decisions on the part of the Council in relations to Child Sexual Exploitation (CSE). Please see section 15 for more information.

- 4.2 Where the complaint is being made on behalf of another person:

Telford and Wrekin Council will consider representations including complaints made to us by any customer or third party who is contacting us on the customer's behalf. If someone makes representations on customer's behalf written consent will be sought, before the complaint is registered.

- 4.3 The Complaints Manager may decline to register a complaint if it appears that it is being brought by a representative who is not acting in the best interests of the customer. Before reaching a decision of this nature, the Complaints Manager may consult with a

number of individuals/organisations. Although this list is not exhaustive this may include:-

- The complainant;
- Legal advisors;
- Local Government & Social Care Ombudsman;
- Other council departments;
- Other public bodies (health, police, GP, DWP); and
- Any support or advocacy services that the complainant is receiving support from.

Any such decision will be recorded and notified in writing to the complainant. This decision will be retained in accordance with retention time scales for corporate complaint records which is 6 years, however where there is a children's social services file the decision will be retained in accordance with children's file retention which is 25 years and will be destroyed at the same time that the children's file is destroyed if that is longer than 6 years.

- 4.4 From time to time the council receives anonymous complaints, these will be logged and passed to the relevant service for investigation, whilst a response cannot be sent in these cases it is important that we investigate and taking learning from these complaints.
- 4.5 Complaints will not be registered more than a year after the matter giving rise to concern arose. Nevertheless, the Complaints Manager may waive this time limit if;
- It would not be reasonable to expect the complainant to have made the complaint sooner, and
 - It is still possible to deal with the complaint effectively and fairly.

5. What is excluded from this procedure?

5.1 The procedure will **not** apply where it is a:

- request for service, which is defined as 'a request that the Council provides or improves a service, fixes a problem or reconsiders a decision'.
- request for information

5.2 The complaints procedure specifically excludes certain matters;

- **Legal matters** – issues that involve a legal action by or against, the Council.
- **Insurance matters** – issues that involve an insurance claim against the Council or its insurers.
- **Statutory, regulatory or other procedures** including:
 - Admissions to schools.

- Complaints about decision to place a child on the Child Protection Register.
- Childcare matters such as court decisions and care proceedings.
- Childminders and residential care and nursing homes – decisions on appeals against failure to register and against decisions to de-register.
- Social services complaints:
 - Children & Young People
 - Adults and vulnerable people
- Objections to planning applications.
- Council tax and housing benefit determinations- should be considered under Courts or Tribunals.
- Complaints about Councillors- this will be referred to the Monitoring Officer.
- Enforcement procedures for which there is a right of appeal.
- Licensing and registration – appeals against refusals, revocations or conditions attached.
- Parking fines and Enforcement for which there is a right to appeal
- Planning decisions- applicant’s right of appeal Right to Buy Valuation re-determinations Special Educational Needs Tribunals
- Staff matters covered by the grievance, disciplinary and recruitment and selection procedures.
- Statutory Landlord and Tenant matters.
- School Complaints- dealt with via the Head and board of governors.

A complaint will not be taken where it relates to the decision/ outcome of an appeal. However, a complaint may be taken relating to the process of how the decision was made.

- **Repeat matters**- A matter that has been previously considered under the Council’s Complaints policy and procedures.

If a complaint is not accepted, a detailed explanation will be provided to the complainant setting out the reasons why the matter is not suitable for the complaints procedure and the right to take the decision to the relevant ombudsman service.

5.3 Relationship to other Policies and Processes

This procedure may be suspended if any of the following procedures are invoked:

- a) Disciplinary and Grievance Procedures
- b) Harassment Procedures
- c) Police Investigation- Criminal
- d) Children’s Social Services Complaints Procedure
- e) Adults Social Service Complaints Procedure
- f) Safeguarding Procedure

- 5.4 Any complaint which contains an allegation or suspicion of fraud, corruption or financial irregularity, whether allegedly carried out by an employee or third party against the Council, will be reported immediately to Audit Services for investigation.

5.5 Complaints concerning staff from other agencies

In cases where a complaint is received regarding a partner agency where there are no elements that require a response from the Council, the complaint will be recorded by the Customer Relationship Team, this information will be retained in accordance with retention time scales for corporate complaint records, which is 6 years. The Customer Relationship Team will seek permission from the customer to pass the complaint to the relevant person who has the responsibility for managing complaints for the other agency. The Customer Relationship team will also advise the complainant that they can share these concerns directly with other agencies themselves, signposting details will be provided. The Council will provide a response to any elements of the complaint relating to council services.

5.6 Complaints regarding external contractors

If the complaint involves services that are provided for the Council by external providers, in the first instance the Council would wish to be notified if there is a problem. However, it is important that the external provider be given the opportunity to investigate and try and resolve the complaint directly with the customer.

Each external provider has their own complaints procedure in line with their contractual obligation to the Council. The Council will maintain an oversight of all complaints dealt with under the contractual arrangement.

If a customer remains dissatisfied following a response from the contractor, they may raise it at stage 2 of this procedure. We would not expect the customer to complete two complaints procedures.

5.7 Compensation Claims

When a complaint gives rise to a potential or actual insurance claim; usually this involves the customer suffering loss or injury arising out of an alleged negligent act by the Council, its employees or agents. Such complaints will be forwarded to the Council's Insurance Team and the customer informed.

Section 2- How the Process Works

6. How the process works

6.1 This section details the procedure for handling all representations, which must be registered with the Customer Relationship Team.

6.2 Compliments, Comments and Suggestions

It is very important that the service learns from the positive statements made by customers as well as the negative comments about services. Where these other forms of representation are made, including criticisms which the sender does not wish to regard as a complaint, the Customer Relationship Team will record and forward these representations to the appropriate manager for their attention.

6.3 Complaints

The purpose of a complaints process is to resolve concerns raised by customers and their representatives, to deliver outcomes which are appropriate and proportionate to the seriousness of the issues and to ensure that changes are made in response to any failings which are identified.

6.4 To achieve this, the approach to handling complaints must incorporate the following elements

- Engagement with the complainant or representative throughout the process
- Agreement with him/her about how the complaint will be handled
- A planned, risk-based and transparent approach
- Commitment to prompt and focussed action to achieve desired outcomes
- Commitment to improvement and the incorporation of learning from all complaints.

6.5 How complaints can be made

You can make a complaint through a variety of channels either in person, by phone, in writing or by email using the details below, or, you can fill in the Customer Feedback Form online at [Customer Contract, Customer Strategy, Complaints Compliments and Feedback - Telford & Wrekin Council](#) . You can also submit a complaint at various points within the organisation, to staff members via the respective email addresses or direct to the Customer Relationship Team. Complaint correspondence should be scanned and emailed to the Customer Relationship Team. The internal post should not be used.

In person at Customer Relationship Team, Telford & Wrekin Council, Darby House, Lawn Central, Telford, TF3 4JA

Phone Customer Services on 01952 382006

Write to: Customer Relationship Team, Telford & Wrekin Council, Darby House, Lawn Central, Telford, TF3 4JA

Email us at customer.relationship@telford.gov.uk.

- 6.6 Regardless of the medium used or the point where it arrives within the organisation, each complaint must be notified immediately to the Customer Relationship Team, so that it can be registered, formally acknowledged and defined within 2 working days. If the complaint has been received verbally, staff in the Customer Relationship Team will make a written account of it which will be sent to the complainant with the acknowledgment.
- 6.7 Where complainants require support or assistance with regard to the process and substance of their complaint, the Customer Relationship Team will appropriately signpost them to available advocacy services. Please see section 16 for a list of services that the Council will refer customers too
- 6.8 There are two stages in the procedure, allowing for the initial response by the service concerned (usually the Service Delivery Manager or Team Leader) and a second stage investigation by an investigator independent of the service being complained about. There is not a requirement for this investigator to be independent of the Council under this policy. However, for complaints involving CSE it may be appropriate for a stage 2 investigation to be completed by an investigator independent of the council, followed by a response from the Director for Children's Safeguarding and Family Support.

6.9 **Stage One- Service Investigation**

- 6.9.1 The complaint will be recorded for the relevant service area on the Councils' Complaints System.
- 6.9.2 All complaints should be acknowledged by the Customer Relationship Team within 2 working days of receipt. The acknowledgement letter/email should clearly state the reference number and name of the investigating officer, which will normally be the Service Delivery Manager or Team Leader responsible for the service in question. The Customer Relationship Team will set out its understanding of the complaint and confirm the outcomes that the customer is seeking. If any aspect of the complaint is unclear, the complainant will be asked for clarification and the full definition agreed between both parties.
- 6.9.3 The relevant service area will investigate the complaint and respond to the customer within the timescales set out in this procedure.
- 6.9.4 The investigator will;
- deal with complaints on their merits
 - act independently and have an open mind
 - take measures to address any actual or perceived conflict of interest
 - consider all information and evidence carefully
 - keep the complaint confidential, with information only disclosed if necessary to properly investigate the matter.
 - Address all points raised in the complaint definition
- 6.9.5 A full response should be sent within 10 working days of the complaint being acknowledged to the complainant and should advise the customer of their right to

take the complaint to stage 2 of the complaints procedure. This request should be made by the customer within 20 working days of receiving the response to their concerns.

- 6.9.6 Where additional complaints are received after one has been recorded and the matters raised are related, it will be incorporated within the response that has been logged. However, where a response has already been sent or it is regarding new unrelated issues or would unreasonably delay the response, the additional complaints will be logged as a new complaint.
- 6.9.7 It may be appropriate on occasion for a complaint to be put on hold and a holding response sent. For example where there are ongoing legal proceedings or the matter is being considered via another process, which needs to be completed before it can be considered via the complaints process. Complainants will be informed of the reasons why a 'holding' response is considered appropriate, when the formal investigation will recommence and the timescale for completion.
- 6.9.8 Where an investigation is unlikely to be completed within 10 working days, the investigating officer should request an extension from the Customer Relationship Team giving a reason for the extension. The Customer Relationship Team will send an update informing the complainant of the extended response date, which should then be completed within 20 working days.
- 6.9.9 On completion, the investigating officer should pass a copy of the full response to the Customer Relationship Team so that the action taken can be recorded on the complaints system and any outstanding or follow up actions can be monitored and appropriate updates provided to the complainant.
- 6.9.10 Where timescales exceed 20 working days, the complainant will be provided with the reason and this will be clearly explained and suitable intervals for updates will be agreed with the customer. The complainant will also be provided with the details of the relevant Ombudsman.

6.10 Stage Two- Independent Investigation

- 6.10.1 If the customer is not satisfied with the outcome of the investigation at Stage 1, they may request that the complaint be escalated to stage 2. The stage 2 complaint investigation will be considered by the Senior Formal Complaints Investigator, who is a member of the Customer Relationship Team and Independent from Corporate services.
- 6.10.2 Requests for a complaint to be considered at stage 2 will be acknowledged and recorded at stage 2 of the complaints procedure within 5 working days. Within the acknowledgement, we will set out our understanding of any outstanding issues and the outcome the complainant is seeking. If any aspect of the complaint is unclear, the complainant will be asked for clarification.
- 6.10.3 A complaint will not be escalated to Stage 2 of the procedure if any of the exclusions apply as outlined in Part 5 of this procedure. If a complaint is not escalated, a detailed explanation will be provided to the customer setting out the

reasons why the matter is not suitable for the complaints procedure and the right to take the decision to the relevant Ombudsman.

6.10.4 The Independent Senior Formal Complaint Investigator will compile a full response within 20 working days. In complex cases the response timeframe may be extended to a maximum of 40 working days. In which case an explanation will be sent to the customer detailing progress and expected timescale for response. The investigation should then be completed within a maximum of 40 working days.

6.10.5 Where timescales exceed 40 working days, the complainant will be provided with the reason and this will be clearly explained and suitable intervals for updates will be agreed with the customer. The complainant will also be provided with the details of the relevant Ombudsman.

6.10.6 The purpose of Stage 2 in this procedure is to consider if:

- The customer's complaint was fully understood and addressed;
- All of the relevant evidence was taken into account;
- The Council's policies and procedures were properly followed;
- The complaints process was carried out properly and fairly;
- The conclusions were reasonable and fair and reached on the basis of evidence;
- Any other actions or remedies are appropriate.

It is not to:

- Reinvestigate the complaint – it will focus on understanding continuing concerns and consider whether the Stage 1 resolution was undertaken fairly and that the conclusions reached were reasonable;
- Revisit a decision taken by committee or an officer under delegated powers;
- Undermine the professional judgement of officers;
- Deal with any new matters that were not part of the original complaint;
- Cover any points dealt with by a court or where an appeal against a decision lies with a court or other legal process.

6.10.7 On completion of the Stage 2 investigation the recommendations will be passed to the Director to agree any recommendations / service improvements resulting from the investigation. The investigation response will then be forwarded to the customer and will include information on their right of redress to the Local Government and Social Care Ombudsman or Housing Ombudsman Service, if they continue to remain dissatisfied. Any outstanding actions will be monitored and actioned promptly with appropriate updates provided to the complainant.

6.10.8 The stage 2 response will confirm in clear and plain language;

- The complaint stage
- The complaint definition
- The decision of the complaint
- The reasons for any decisions made

- The details of any remedy offered to put things right
- Details of any outstanding actions
- How to escalate the matter to the relevant Ombudsman Service, if the customer remains dissatisfied

6.11 Special Cases

In certain cases, the general rules regarding who investigates complaints will not apply. These cases will be as follows:

- At Stage 1, if the complaint relates to the actions of the Service Delivery Manager/ Team Manager who would normally act as investigating officer, it should be referred to the appropriate Director for action.
- Any complaint against a Director should be referred to the Chief Executive for action or may be referred to the Council's Monitoring Officer.
- There is a separate procedure for investigating complaints about Elected Members of the Council, which should be referred to Council's Monitoring Officer.
- In the case of complaints involving actions and decisions involving CSE, the council may source an Independent Investigator and/or an Independent Person to have oversight of the investigation. The investigation report will be shared with the Director of Children's Safeguarding and Family Support who will provide a response to the findings.

6.12 Complaints covering more than one service

Where a Stage 1 or Stage 2 complaint involves more than one service, then the relevant investigating officers should liaise so that whenever possible a single co-ordinated response is sent to the complainant. The Customer Relationship Team may at times co-ordinate such a response.

6.13 The Process

	Action	Timescale	Responsibility
	Stage 1		
1.	To notify the Customer Relationship Team of any complaint which has been received elsewhere in the Council	Immediately, by phone, or email	All members of staff
2.	Send a formal acknowledgement to the customer that the complaint has been received and registered, this will include a definition of the complaint.	Within 2 working days	Customer Relationship Team
3.	To pass the complaint to the relevant Service Delivery Manager	Within 2 working days	Customer Relationship Team
4.	To undertake investigation and actions to resolve the complaint informally at Stage 1 to the	10 working days (extendable by 10 more working days if the complaint is complex)	Relevant Service Delivery Manager

	customer's satisfaction. The findings should be communicated in writing to the customer.		
	Stage 2		
1.	Customer makes a request to escalate their complaint to Stage 2.	Within 20 working days of the Stage one response.	Complainant
2.	Send an acknowledgement to the customer, outlining outstanding matters and outcomes. Confirming that the complaint has been received and recorded at Stage 2 of the procedure.	Within 5 working days	Customer Relationship Team
3.	To notify the complainant where appropriate the reasons for extension past 20 working days and to specify a new completion date.	Within 20 working days of the acknowledgment if complaint response remains outstanding	Senior Formal Complaints Investigator
4.	To complete the investigation and submit the draft response to the appropriate Director for approval of the recommendations / service improvements resulting from the complaint investigation.	Within 20 working days of complaint acknowledgment (unless extension notified to complainant in which case this period is extended to 40 working days maximum.)	Senior Formal Complaints Investigator
5.	To provide the complainant with a formal Stage 2 response.	Within 20 working days of complaint acknowledgment (unless extension notified to complainant in which case this period is extended to 40 working days maximum.)	Senior Formal Complaints Investigator
6.	To discuss learning/ to prepare a Service Action Plan, where relevant, to monitor any service improvements.	Within 25 working days of complaint response having been sent to the customer.	Senior Formal Complaint Investigator

7 Putting things right

7.1 Where something has gone wrong the Council will acknowledge this and set out the actions it has already taken or intends to take to put it right. This can include:

- Apologising;
- Acknowledging where things have gone wrong;
- Providing an explanation, assistance or reasons;
- Taking action if there has been delay;
- Reconsidering or changing a decision;
- Amending a record or adding a correction or addendum;
- Changing policies, procedures or practices;
- Providing financial remedy.

- 7.2 The Council's guidance in the use of financial redress is that this should be made in exceptional circumstances where some direct financial loss or injustice has been incurred, and where agreement has been reached with the Director, as well as the Monitoring Officer. The Council will take account of the good practice guides issues by the ombudsman when deciding appropriate remedies.

8 The Local Government and Social Care Ombudsman (LGSCO)

- 8.1 The Local Government and Social Care Ombudsman is independent and impartial and gives a service which is confidential and free of charge. The Ombudsman has the same powers as the High Court to require people to provide information and to produce documents for investigation.
- 8.2 Any member of the public is able to complain to the Ombudsman if they feel there has been an injustice. However, the Ombudsman's office usually states that customers should first take up their complaint with the relevant Department or Council.
- 8.3 If the customer is not happy with how the Council has dealt with their complaint, they can take the matter to the Ombudsman, whose role is to investigate complaints of maladministration by Local Authorities. Maladministration means that there has been a fault in the way the Council has or has not done something, such as a failure to follow its own rules or a breach of legislation.
- 8.4 Complainants who remain dissatisfied with the proposed outcome after their complaints have been handled within this procedure will be advised that they are entitled to approach the Local Government and Social Care Ombudsman, to request that the matter be considered. Contact the Ombudsman by telephone on **0300 061 0614** or online at www.lgo.org.uk
- 8.5 People who use the Council's services are entitled to make an approach to the Ombudsman at any point. It is generally the case however, that the LGSCO declines to undertake an investigation until the complaint has been dealt with within the local authority's complaints process.

9 Housing Ombudsman Service (HOS)

- 9.1 Telford and Wrekin Council has a small number of properties for which it is the named registered social landlord. If Telford and Wrekin Council are your landlord you may raise your dissatisfaction for tenancy related matters with the Housing Ombudsman Service.
- 9.2 The Housing Ombudsman Service is an independent and impartial service and gives a service which is confidential and free of charge. The Housing Ombudsman Service is set up to look at complaints about housing organisations that are registered with them.
- 9.3 The Housing Ombudsman Service will consider complaints, in accordance with their dispute resolution principles, if the customer is not happy with how the Council has dealt with their complaint.

- 9.4 Complaints which can be considered by the Housing Ombudsman Service will be progressed by the Customer Relationship Team as per this procedure. However, following the outcome at stage two of this process, the customer may raise the matter with the Housing Ombudsman Service.
- 9.5 Information about the Housing Ombudsman Service can be found on their website www.housing-ombudsman.org.uk.

The Housing Ombudsman's contact details are:

Housing Ombudsman Service
PO Box 152
Liverpo
oLL33
7WQ

Tel: 0300 111 3000

Email: info@housing-ombudsman.org.uk

10 Improving services following complaints

- 10.1 A primary objective of the complaints process is to ensure that mistakes are identified and remedied, and that they are not repeated in future. Achieving this requires analysis of what went wrong, why the mistake was made and what changes are needed to ensure that it does not recur.
- 10.2 We are committed to ensuring that all possible lessons are learnt from the complaints we deal with, that our services improve as a result and that any mistakes that are identified are not repeated. For this reason, we have put in place ways of maximising the learning opportunities which arise from complaints.
- 10.3 Most complaints prove capable of being resolved with relative informality at the first stage. It is nevertheless crucial that the issues and themes which arise from these complaints are considered carefully and comprehensively so that any poor practice or structural difficulties are identified and addressed. The number and type of complaints about each service area are reported on a quarterly and 12 monthly basis to the Senior Management Team with a summary of comments, recommendations and any emerging themes.
- 10.4 Complaints which are handled at Stage 2 invariably raise important issues for the Council and the Investigator's response provides an invaluable independent perspective on the service provided and on the matters which resulted in the complaint.
- 10.5 A summary of learning points and changes made arising from complaints will be included in the annual report on complaints.

11. Unacceptable behaviour and unreasonable persistent complainants

- 11.1 We are committed to providing an inclusive, responsive and easily accessible complaints process. We will generally not impose restrictions upon the way in which complainants are able to contact or communicate with staff members.
- 11.2 In line with the authority's duty of care however, staff are entitled to protection from complainants whose behaviour is abusive, offensive, threatening or unreasonably persistent. Whilst Vexatious and persistent behaviour is dealt with under this policy. Unacceptable behaviour, should also be considered in line with the Council's Treating Employees with Dignity & Respect policy, which outlines a commitment to providing a safe and secure working environment for its employees. As such, we will not tolerate acts or threats of physical violence, intimidation, harassment, discrimination, verbal abuse or coercion against our staff.
- 11.3 In such cases, the Customer Relationship Team will inform the complainant why their behaviour is considered unacceptable and ask them to change it. If this has no effect, possible ways forward will be discussed at a formal (noted) professionals meeting, convened and chaired by the Customer Relationship Team. Decisions and action in such cases must be consistent, proportionate to the concerns, time-limited and subject to review.
- 11.4 Among the possible measures available are
- Restriction of access to service area sites
 - Routing of all contact with the person through a named staff member
 - Requiring contact with the person to be by letter only
 - Proposing a formal agreement with the complainant about their behaviour
 - Accessing legal advice regarding obtaining an injunction
 - Notification to the police
 - Notification to the keeper of the Council's Personal Safety Precautions Register
 - Where matters have previously been responded to, correspondence will be kept on file and not responded to.
- 11.5 Whilst no single definition of an unreasonable persistent complainant exists, vexatious behaviour may include some or each of the following, this is not an exhaustive list;
- Refusing to specify grounds of the complaint, despite offers of assistance from the council.
 - Refusing to cooperate with the complaints investigation process whilst still wishing the complaint to be resolved.
 - Refusing to accept that issues are not within the remit of a complaints procedure despite having been provided with information about the procedure's scope.
 - Unwillingness to accept the terms of the complaints procedure.
 - Insisting on the complaint being dealt with, in ways that are incompatible with the complaints procedure or good practice.

- Making what appear to be groundless complaints about the staff dealing with the complaint, and seeking to have them replaced.
- Changing the basis of the complaint as the investigation proceeds and/or denying statements made at an earlier stage.
- Introducing trivial or irrelevant new information which the complainant expects to be taken into account and commented on, or raising large number of detailed but unimportant questions and insisting they are fully answered.
- Electronically recording meetings and conversations without the prior knowledge and consent of the other persons involved.
- Making unnecessary excessive demands on the time and resources of staff whilst a complaint is being looked into, by for example excessive telephoning or sending emails to numerous council staff, writing lengthy complex letters every few days and expecting immediate responses.
- Submitting repeat complaints, after the complaints processes have been completed, essentially about the same issues, with additions/variations which the complainant insists make these “new” complaints which should be put through the full complaints procedure.
- Refusing to accept the decision – repeatedly arguing the point and complaining about the decision.
- Repetition of identical or similar complaints, but failure to accept any outcome
- Excessive focus on the complaints process, as opposed to the desired outcome
- Focus on unrealistic and unachievable outcomes
- Unreasonably persistent and repetitious contact with the service area
- Tendency to approach different parts of the organisation, in the apparent hope of eliciting different responses
- Abusive or threatening behaviour or language towards council staff.

11.6 Subject to any considerations about unacceptable behaviour, it is crucial to ensure that the substance of any complaint which seems to be being pursued in a vexatious manner is considered and investigated with the same rigour as any other complaint, as far as possible. Only on this basis could the service area justify any later course of action which had the effect of treating the complainant differently from others.

11.7 Any restrictions placed on contact due to unacceptable behaviour will be proportionate and demonstrate regard for the provisions of the Equality Act 2010.

- 11.8 Where a person's attempts to circumvent the contact restrictions put in place under this policy we can and will make a decision based upon the evidence and, if necessary, extend the contact restrictions to other parties/ persons if judged appropriate.
- 11.9 The basis on which a vexatious complainant might be treated differently from any other complainant stems from the authority's obligation to deploy its resources as fairly as possible. This entails avoiding using resources disproportionately and unproductively in respect of some individuals. Responding to vexatious complaints can be stressful to the staff involved and the authority's duty of care to its employees requires appropriate remedial action to be taken in such cases.

12. Compliments and comments

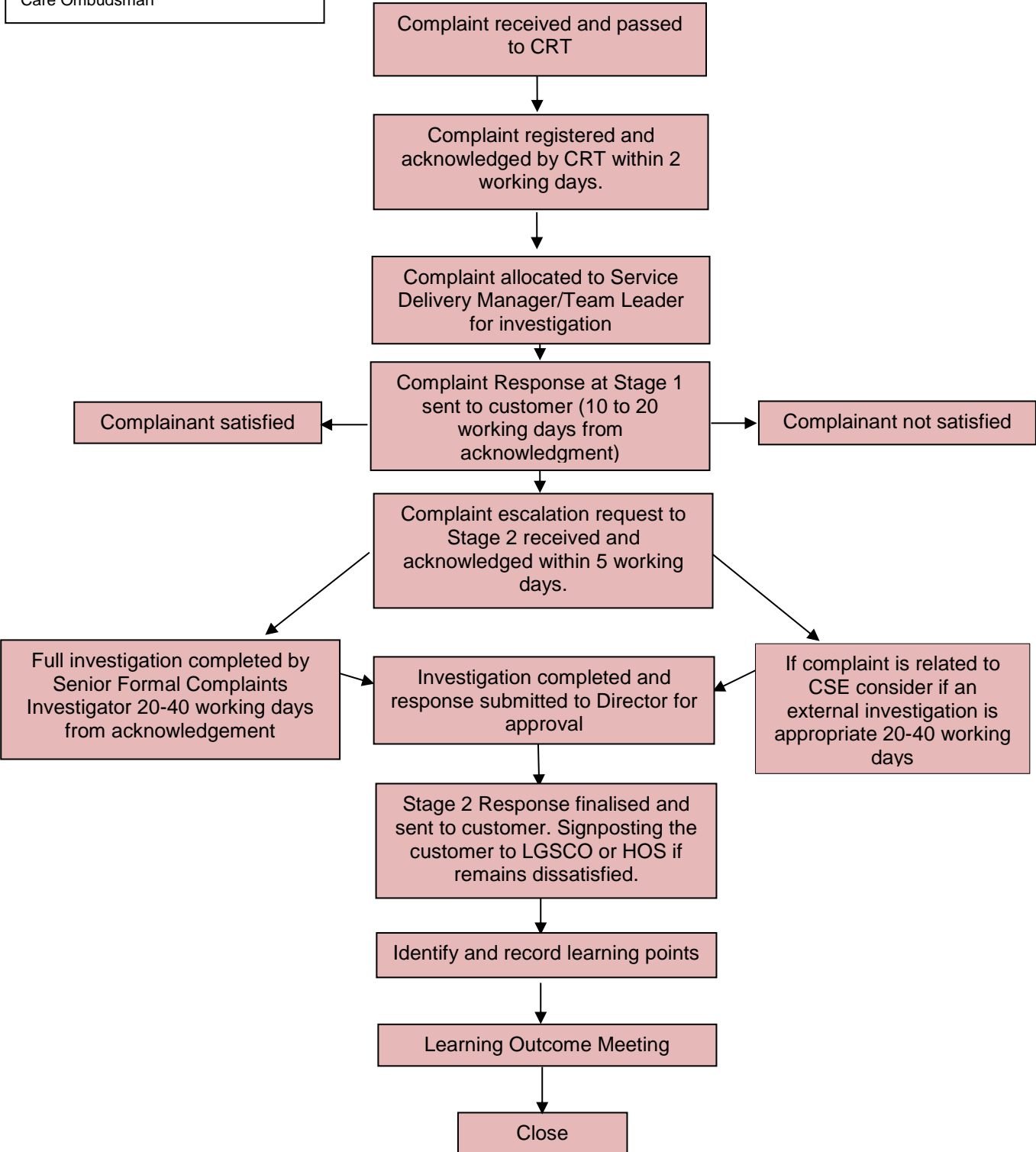
- 12.1 All comments or compliments, whether received in person, by telephone, in writing or by e-mail should also be passed to the Customer Relationship Team, as soon as possible i.e. by fax, e-mail or telephone for acknowledging.
- 12.2 If a comment requires further action or a response, this will be passed to the Team Leader or Service Delivery Manager responsible for the service concerned. The Manager will aim to deal with the comment within the same time scale as a complaint and should notify the Customer Relationship Team of the action taken.

13. Performance monitoring

- 13.1 Activities undertaken within the complaints procedure will be reported on a monthly, quarterly and 12 monthly basis to the Senior Management Team, and will be summarised in an Annual Complaint's Performance and Service Improvement Report, which will be published on the Council's website. A self-assessment against the complaint handling codes will also be completed and published on the Council's website.
- 13.2 In considering complaints performance, particular attention will be paid to
- Number of complaints arising in each service area.
 - Number of complaints that the Council has refused to accept
 - Proportion which were upheld on investigation.
 - Significance of any common themes which emerge from complaints.
 - Extent of compliance with agreed timescales.
 - Extent of customer satisfaction with the operation of the process.
 - Number of complaints which have not been resolved within the process, and are referred to the Ombudsman.
 - Any learning identified.
 - Changes and improvements which occur in consequence of complaints.
 - Number of cases that do not comply with the complaint handling codes as set out by the LGSCO and HOS.
- 13.3 Activities undertaken in relation to complaints involving the actions and decisions relating to CSE will be reported annually as part of CSE data reporting.

14. Corporate Complaints Flowchart

Key
 CRT – Customer Relationship Team
 HOS- Housing Ombudsman Service
 LGSCO- Local Government and Social Care Ombudsman



15. Complaints involving Child Sexual Exploitation (CSE)

1. Context

- 1.1 Over the last decade, national awareness of child sexual exploitation, and its impact on those affected by it, has grown significantly. At the same time, professional practices have changed and adapted to support those who have been, or are being, exploited. In Telford & Wrekin, professional practice also aims to support those identified as being at risk of exploitation.
- 1.2 Within Telford & Wrekin, the Independent Inquiry into Child Sexual Exploitation published its report on 12 July 2022 – rightly, this has also served to increase awareness of CSE.

As a result, it is anticipated that, as more people become aware of CSE, there may be an increase in complaints relating to both current and historic professional practice.

- 1.3 It is recognised that one of the recommendations of the Independent Inquiry into Telford CSE is that the Council reviews how it manages complaints. It is necessary to ensure that any complaints are dealt with appropriately. That being the case, a copy of this document will be made available to members of the public on the Council's website, with hard copies provided on request.

2. Defining and processing complaints involving CSE

- 2.1 The Children Act 1989 Representations Procedure (England) Regulations 2006 came into force on 1 September 2006. This created a child statutory complaints procedure for some cases involving Children's Services. However, not all involvement of the Children's Safeguarding and Family Support Service is covered by that statutory complaints procedure.
- 2.2 This policy and procedure applies solely to complaints related to CSE that fall outside of the Child Statutory Complaints procedures. The procedure will **not** apply where it is more appropriate for the complaint to follow the Children's statutory complaints procedure under The Children Act 1989 Representations Procedure (England) Regulations 2006.
- 2.3 Given the historical nature of many of these potential cases, and the outcome of the inquiry, complaints will be registered regardless of the time period that has passed provided that they relate to the time period that Telford and Wrekin Council has been in existence 1 April 1998.
- 2.4 It should be noted at the outset that those who are, or have been, victims of sexual abuse (which includes sexual exploitation) have the legal right to a greater level of confidentiality than others. This means that their details should not be shared with anyone else except as absolutely needed to deal with their complaint. If those

dealing with any complaint are in any doubt as to whether or not details can be shared, they will seek advice from the Council's legal team.

- 2.5 In the case of complaints involving actions and decisions involving CSE, the council may source an Independent Investigator and/or an Independent Person to have oversight of the investigation at stage 2 of this procedure. The investigation report will be shared with the Director of Children's Safeguarding and Family Support who will provide a response to the findings.
- 2.6 In some cases the Complaints Manager may feel that it is more appropriate for the complaint to immediately be investigated at stage 2 of this procedure, complainants will be advised if this is the case. In most cases, it is desirable and possible to resolve complaints promptly, with the minimum of formality and as close as possible to when they arose.

Please also see Appendix A - which specifically outlines how we respond to complaints involving Child Sexual Exploitation (CSE), this can also be found on our website as a separate document at [Complaints procedures - Telford & Wrekin Council](#)

This is intended to be used as a separate-standalone guide for customers who specifically wish to make an complaint regarding this subject.

16. Signposting to Advocacy and Support Services

Organisation	Website/ email	Telephone
Telford and Wrekin Information, Advice and Support Service	www.cyp.iassnetwork.org.uk/service/telford-and-wrekin-iass/ Info@iass.org.uk	01952 457176
Children's Commissioner's Advice Service	www.help.team@childrenscommissioner.gov.uk	0800 5280 731
Safeguarding Shropshire Children	www.safeguardingshropshireschildren.org.uk	0808 8005 792
The Children's Society	www.childrensociety.org.uk supportercare@childrenssociety.org.uk	0300 303 7000
Pohwer	www.powher.net / pohwer@powher.net	0300 456 2370
ECPAT	www.ecpat.org.uk	
Migrant Help	www.migranthelpuk.org	
Barnardos	www.barnardos.org.uk	
CORAM	www.coram.org.uk	
The Holly Project	www.hollyproject.org info@hollyproject.org	01952 947 831

Version Control		
Date	Version Number	Comments
April 2024	Version 1.0	Procedure adopted



How we respond to complaints involving Child Sexual Exploitation (CSE)

Our approach:

At Telford and Wrekin Council we recognise that making a complaint to an organisation that is seen to be in authority can be really challenging process for survivors of CSE, especially given the potential for the complaint to re-traumatise complainants.

With this in mind we want to make our complaints process accessible to survivors and provide reassurance that complaints will be handled in a sensitive and appropriate manner.

Where survivors require support or assistance with regard to the process and substance of their complaint, the Customer Relationship team will appropriately signpost them to available advocacy services. Please see a list of services that we will refer customers too at the end of this document.

It should be noted at the outset that those who are, or have been, victims of sexual abuse (which includes sexual exploitation) have the legal right to a greater level of confidentiality than others. This means that details will not be shared with anyone else except as absolutely needed to deal with the complaint.

Given the historical nature of many of these potential cases, and the outcome of the inquiry, complaints will be registered regardless of the time period that has passed provided that they relate to the time period that Telford and Wrekin Council has been in existence 1 April 1998.

Any decisions and responses in relation to complaints will be retained in accordance with retention time scales for corporate complaint records which is 6 years, however where there is a children's social services file the decision will be retained in accordance with children's file retention which is 25 years and will be destroyed at the same time that the children's file is destroyed if that is longer than 6 years.

Complaint Procedures:

Complaints involving CSE will be responded to under one of the two complaint procedures that are available for these matters.

- The Children's Statutory Complaints procedure introduced by the Children's Act 1989 Representations Procedure (England) Regulations 2006 was created for some cases involving children's services. However, not all involvement of the Children's Safeguarding and Family Support Service is covered by the statutory complaints procedure.

- In cases not covered by the statutory procedure, the complaint will be responded to under the Council's Corporate Complaints procedure. This procedure is open to everyone who has been directly affected by the actions or decisions on the part of the Council in relation to Child Sexual Exploitation (CSE).

Where a complaint is received regarding a partner agency where there are no elements that require a response from the Council, the complaint will be recorded by the Customer Relationship team, this information will be retained in accordance with retention time scales. The Customer Relationship team will seek permission from the complainant to pass the complaint to the relevant person who has the responsibility for managing complaints for the other agency. The Customer Relationship team will also advise the complainant that they can share these concerns directly with other agencies themselves, signposting details will be provided.

In cases where there are elements for the council a response will be provided to the elements of the complaint relating to council services.

The Complaint Process:

All complaints registered under the corporate procedure should be acknowledged by the Customer Relationship Team within 2 working days of receipt. Please note that a complaint registered under the statutory complaint procedure should be acknowledged within 2 working days.

The Customer Relationship Team will set out its understanding of the complaint and confirm the outcomes that the customer is seeking. If any aspect of the complaint is unclear, the complainant will be asked for clarification and the full definition agreed between both parties.

A full response should be sent within 10 working days of the complaint being acknowledged and will outline the complainants right to request that the complaint is considered at stage 2 of the complaints procedure. This request should be made by the complainant within 20 working days of receiving the response to their concerns.

Where an investigation is unlikely to be completed within 10 working days. The Customer Relationship Team will send an update informing the complainant of the extended response date, which should then be completed within 20 working days.

If the complainant is not satisfied with the outcome of the investigation at Stage 1, and requests that the complaint be investigated to stage 2, the stage 2 complaint investigation will be considered by the Senior Formal Complaints Investigator, who is a member of the Customer Relationship team and independent from corporate services.

Under the corporate procedure a response will be issued in 20 working days up to a maximum of 40 working days.

In the case of complaints involving actions and decisions involving CSE, the Customer Relationship team may source an Independent Investigator and/or an Independent Person to have oversight of the investigation at stage 2 of the corporate procedure.

The investigation report will be shared with the Director of Children's Safeguarding and Family Support who will provide a response to the findings.

Any complaints registered under the statutory procedure are required to be considered by an Independent Investigator and Independent Person at stage 2 of the procedure. A response will be issued within 25 working days up to a maximum of 65 working days.

In some cases the Complaints Manager may feel that it is appropriate for the complaint to immediately be investigated at stage 2 of the procedure, complainants will be advised if this is the case. In most cases, it is desirable and possible to resolve complaints promptly, with the minimum of formality and as close as possible to when they arose.

The response at stage 2 of the corporate procedure will outline the findings and will also outline the complainant's rights if they remain dissatisfied with the response. This will include the contact details for the Local Government and Social Care Ombudsman.

Under the statutory procedure if the complainant remains dissatisfied with the outcome at stage 2 of the procedure they can request a stage 3 panel, which includes an Independent Chair and Independent Panel members, who will consider any outstanding concerns following the stage 2 and make recommendations where appropriate. Complainants will be supported through this stage of the procedure.

Activities undertaken in relation to complaints involving the actions and decisions relating to CSE will be reported annually as part of CSE data reporting.

This document has been created to outline the councils approach to complaints involving CSE but should also be considered alongside the full complaint procedures which can be found on our website at [Complaints procedures - Telford & Wrekin Council](#)

Advocacy and Support Services

Organisation	Website/ email	Telephone
Telford and Wrekin Information, Advice and Support Service	www.cyp.iassnetwork.org.uk/service/telford-and-wrekin-iass/ Info@iass.org.uk	01952 457176
Children's Commissioner's Advice Service	www.help.team@childrenscommissioner.gov.uk	0800 5280 731
Safeguarding Shropshire Children	www.safeguardingshropshireschildren.org.uk	0808 8005 792
The Children's Society	www.childrensociety.org.uk supportercare@childrenssociety.org.uk	0300 303 7000
Pohwer	www.powher.net / pohwer@powher.net	0300 456 2370
ECPAT	www.ecpat.org.uk	
Migrant Help	www.migranthelpuk.org	
Barnardos	www.barnardos.org.uk	
CORAM	www.coram.org.uk	
The Holly Project	www.hollyproject.org info@hollyproject.org	01952 947 831



Telford & Wrekin
Co-operative Council

Protect, care and invest
to create a better borough

Borough of Telford and Wrekin

Cabinet

16 May 2024

Telford and Wrekin Corporate Climate Change Risk Register

Cabinet Member:	Cllr Carolyn Healy - Cabinet Member: Climate Action, Green Spaces, Heritage & Leisure	
Lead Director:	Felicity Mercer - Director: Communities, Customer & Commercial Services	
Service Area:	Communities, Customer & Commercial Services	
Report Author:	Amy Allen – Climate Change Project Support Officer – Climate Change & Sustainability Ian Wykes - Team Leader - Climate Change & Sustainability	
Officer Contact Details:	Tel: 01952 384960	Email: Ian.Wykes@telford.gov.uk
Wards Affected:	All Wards	
Key Decision:	Not Key Decision	
Forward Plan:	Not Applicable	
Report considered by:	SMT – 16 April 2024 Cabinet – 16 May 2024	

1.0 Recommendations for decision/noting:

It is recommended that Cabinet:

- 1.1 Notes the importance of addressing the impacts that current and future climate change is/will have on the Council's ability to deliver its services to its residents, communities, and businesses.

Telford and Wrekin Climate Change Adaptation Plan

- 1.2 Approves the attached Corporate Climate Change Adaptation Plan as set out in Appendix A.
- 1.3 Delegate appropriate authority to the Cabinet Member for Climate Change Action, Green Spaces, Heritage & Leisure and the Director for Communities, Customer and Commercial Services to ensure that the risk register is kept under regular review and updates are received by Cabinet on an annual basis.

2.0 Purpose of Report

2.1 To set out to Cabinet:

- The scientific basis of climate change,
- The importance of addressing the current impacts of climate change and
- The need to adequately prepare for the future impacts of a changing climate.

2.2 The report includes a corporate risk register that assesses the current and future risks of a changing climate and sets out proposed actions to mitigate these, which together form the Telford & Wrekin Climate Change Adaptation Plan.

3.0 Background

3.1 In 2019 Telford and Wrekin Council declared a Climate Emergency and set out an ambitious target to ensure its activities and operations are carbon neutral by 2030. This is **climate change mitigation**; implementing actions to reduce the release of carbon emissions into the atmosphere. The Council is already delivering its 'Becoming Carbon Neutral Plan' to reduce our carbon footprint, reporting annually on progress. In 2022/23, the Council had achieved a 60% reduction in emissions compared to a 2018/19 baseline.

3.2 However, as a local authority, Telford & Wrekin Council must also ensure that its services are able to react to the current and future predicted impacts of climate change. This is **climate change adaptation**.

3.3 The human impact on the Earth's climate is defined as anthropogenic climate change. Since the start of the industrial revolution, the production and release of greenhouse gasses into the atmosphere has been named as the primary driver of the increase in average global temperatures. Figure 1, a graph produced by the Met Office, illustrates this steady increase in the concentration of atmospheric carbon dioxide between 1960 and 2022¹.

¹ [Met Office: What is Climate Change?](#)

Telford and Wrekin Climate Change Adaptation Plan

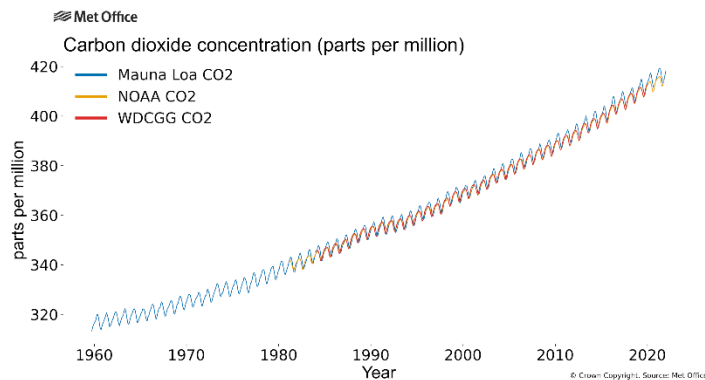


Figure 1: Carbon dioxide concentration (parts per million) (Met Office)

- 3.4 The Intergovernmental Panel on Climate Change (IPCC), the world's most authoritative scientific body on climate change, stated that *'It is unequivocal that human influence has warmed the atmosphere, ocean and land'*². While 2023 saw the hottest year ever recorded, it also saw global sea ice coverage drop to a record low³. These two records, while shocking, encapsulate the impacts of climate change in the world today.
- 3.5 In the UK, it is predicted that climate change will cause warmer, wetter, winters, and hotter, drier, summers. This is coupled with a predicted increase in frequency of extreme weather events, such as storms and droughts. Already, the UK has experienced an increased number of these climate hazards over the last decade. In 2022 alone, the UK experienced 3 storms within a seven-day period (Storms Dudley, Eunice, and Franklin). This is in addition to the five heatwave periods also experienced in 2022, where temperatures exceeded 40°C for the first time on record.
- 3.6 In 2017, a report by the Climate Change Committee (CCC) identified six broad areas of risk facing the UK because of climate change. As illustrated in the infographic below (figure 2), climate change risks cover much more than environmental impact.

² [IPCC AR6 WGI Headline Statements from the Summary for Policymakers](#)

³ [National Oceanic and Atmospheric Administration](#)

Figure SR.1: Top six areas of inter-related climate change risks for the United Kingdom



Figure 2: The top 6 risks facing the UK due to Climate Change (CCC)

- 3.7 In 2022, the IPCC published a report stating that climate change risks and impacts were becoming ‘increasingly complex and more difficult to manage’ and concluded that the increased occurrence of climate hazards would result in hazards occurring simultaneously. This would result in ‘compounding overall risks’⁴.
- 3.8 In addition to causing extreme environmental impact, climate change is inextricably linked to health and wellbeing. Notably, climate change is a huge risk to public health and civil resilience. For example, extreme heat, a climate hazard, was estimated to have caused more than 4500 deaths in 2022⁵ in the UK.
- 3.9 In Telford and Wrekin, some communities have been identified as being vulnerable to extreme heat, which puts many local residents at risk. Figure 3 illustrates the vulnerability of Telford Town Centre, which has been given a potential heat hazard score of 5, the maximum score on the scale⁶. This is an example of an ‘urban heat island’, an urbanised area that experiences higher temperatures than outlying areas.

⁴ IPCC ARC WGII SummaryForPolicymakers.PDF

⁵ BBC: Extreme weather: more than 4500 deaths in England from 2022 heat

⁶ BBC: Check your postcode – Is your area vulnerable to extreme heat?

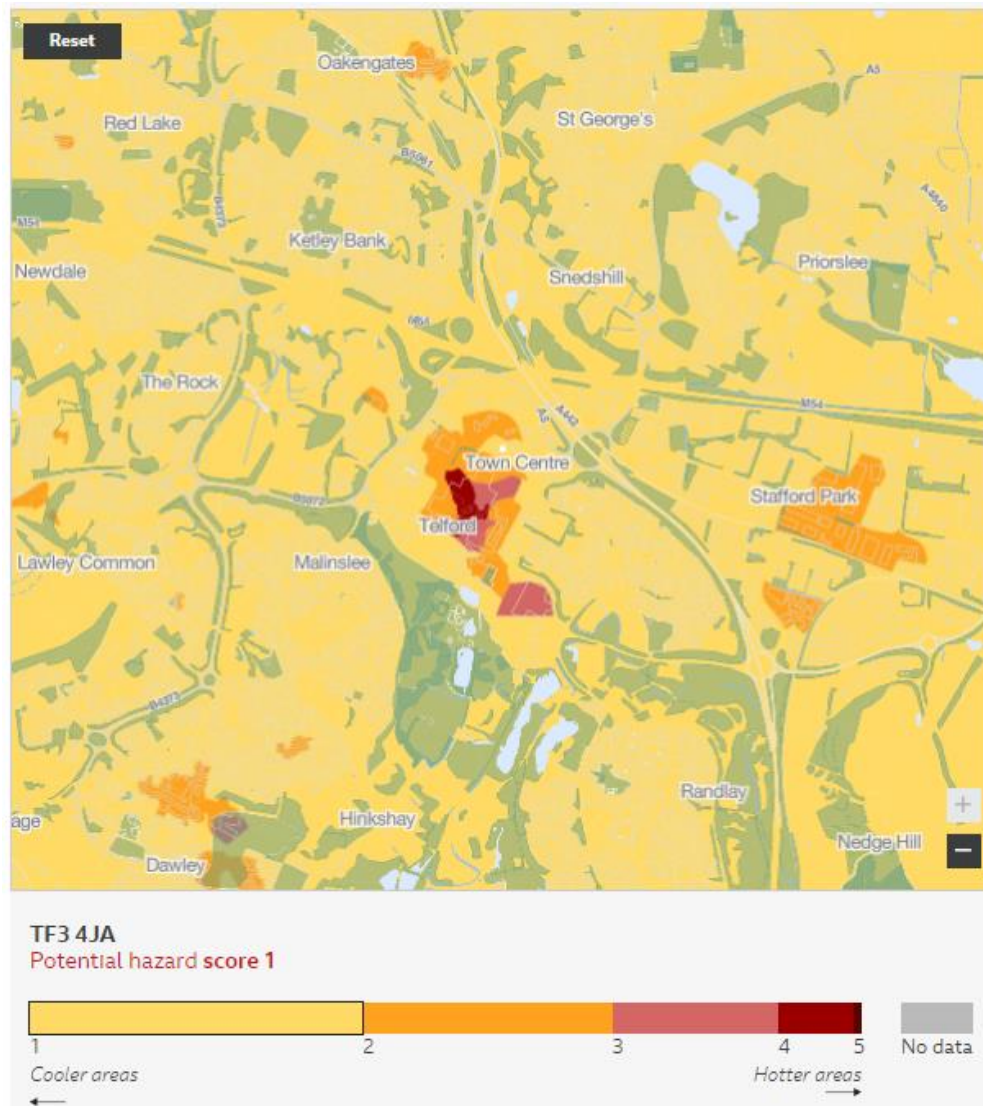


Figure 3: BBC Postcode Heat- Vulnerability Map

3.10 Flooding remains one of the biggest risks to the local area as frequent storms impact on our infrastructure, homes, and businesses. Flooding also poses a significant risk to the delivery of the Councils' services, particularly for the Highways, Flooding, Drainage and Corporate Estate teams.

Climate Change Adaptation:

3.11 Climate change adaptation refers to the process of building resilience against the current and predicted impacts of climate change. As stated previously, the UK is expected to experience an increase in extreme weather events, particularly heatwaves and storms. This will impact the borough's infrastructure, economy, and environment and it is important we are prepared for this.

3.12 Proactively responding to changes in climate results in safer, stronger communities. It is in the interest of the Council to adopt climate adaptation measures to Council services and across the wider borough area. This will

increase the resilience of the Council's services and local communities to future impacts of climate change.

- 3.13 Climate adaptation not only takes account of risks, but it also recognises opportunities that arise from the impacts of climate change. If measures are implemented successfully, climate adaptation co-benefits (such as biodiversity net gain) will arise.
- 3.14 The mechanism of 'adapting' to climate change is often referenced as the 'Adaptation cycle'. Figure 4, a graphic created by the University of Michigan, illustrates the common stages included within the adaptation cycle⁷. This cycle highlights the importance of first identifying risks and assessing vulnerability *before* adaptive measures are implemented. This stage in particular forms a significant part of the Council's approach to climate adaptation.

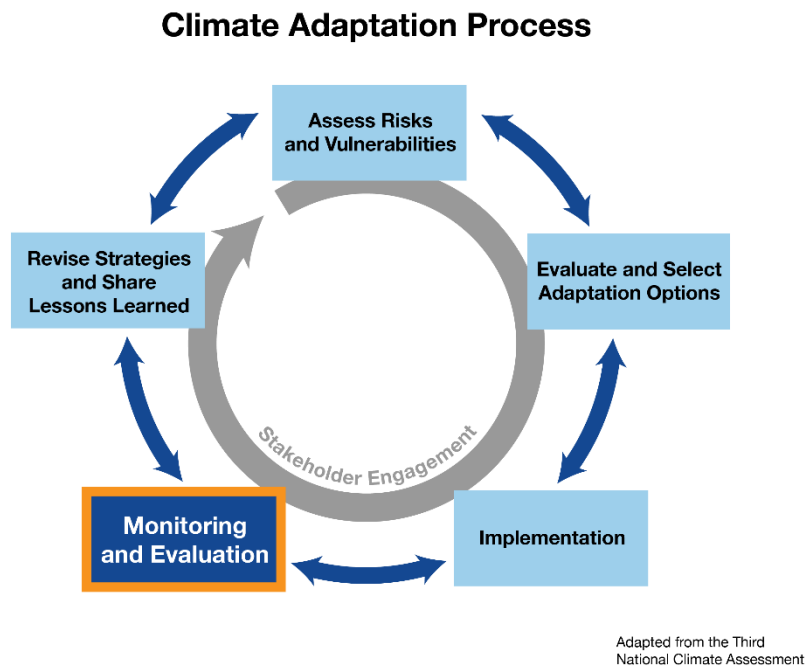


Figure 4: Climate Adaptation Process (University of Michigan)

Climate Adaptation: National Policy context

- 3.15 The UK Government is required by the Climate Change Act (2008) to undertake a Climate Change Risk Assessment every five years. As such, national policy regarding climate adaptation centres around the National Adaptation Programme (NAP) and the UK Climate Change Risk Assessment (CCRA). The latest National

⁷ University of Michigan: Adaptation Monitoring and Evaluation Toolkit

Adaptation Programme, NAP3, sets out the actions that the UK Government and others will take to adapt to the impacts of climate change between 2023-2028.

- 3.16 Alongside the government's leading role in addressing climate adaptation, the NAP requires councils and communities to work together to prepare for and adapt to climate change. Whilst there is no statutory duty for councils to have adaptation plans, the Council has acknowledged that it is a priority due to the current and expected impacts that Climate Change is having in Telford and Wrekin.
- 3.17 The Climate Change Committee (CCC) works closely with central government to advise on climate risks and opportunities, and to evaluate the progress of the NAP. In 2023, a report by the CCC evaluated the success of the NAP2, stating that the NAP2 had not 'adequately prepared the UK for climate change'. Emphasis has now been placed on NAP3 to be 'much more ambitious than its predecessors' and make effective change towards the delivery of climate adaptation measures⁸.

4.0 Summary of main proposals

- 4.1 To build community resilience against the impacts of climate change, identifying risks is vital for risk management. Without identifying and considering the risks, suitable adaptive measures cannot be implemented. Therefore, the development of a Corporate Climate Risk Register will allow the Council to ensure all its plans and policies take full account of climate change adaptation for the benefit of Telford and Wrekin.
- 4.2 The development of the Corporate Climate Change Risk Register started in September 2023. The risk register has been informed by extensive cross Council engagement with officers and members. This has included an adaptation workshop open to all members, and a number of discussions with the Environment Scrutiny Committee. Members of the Committee particularly focused on what is the best support for their communities and how to go about providing this.
- 4.3 Working with Environment Scrutiny Committee in this format is an example of a new approach for members inputting at an early stage into policy development. The success of this project so far has determined that this approach has the potential to be carried across into other Council Scrutiny Committees.

Climate Change Risk Register

- 4.4 The Telford and Wrekin Corporate Climate Change Risk Register has identified the key climate risks to the Council's services and impact this will have on residents, businesses, and the wider community. A high-level risk register is attached as **Appendix A** setting out the key strategic risks. This is based upon, a more detailed full version of the risk register which will be used by the Council to manage these risks at an operational level. The risk register is aligned to the corporate approach to risk management.
- 4.5 To identify risks, the register focuses on the four climatic hazards:

⁸ [CCC: Progress in adapting to climate change – 2023 Report to Parliament](#)

Telford and Wrekin Climate Change Adaptation Plan

- Warmer, wetter, winters
- Hotter, drier summers
- Extreme weather: heatwaves
- Extreme weather: flooding and storms

Each risk is scored using the impact and likelihood scoring matrix. A mitigation measure for each risk is required, and a new impact and likelihood score is given based on the mitigation measure being actioned.

- 4.6 Once all the risks were inputted into the register, the most critical and urgent risks from each directorate were identified to form the basis of the overall risk register.
- 4.7 It is acknowledged that not all the measures identified can be delivered solely by the Council using existing resources. Where this is the case, the Council will adopt partnership working. Adopting partnership working will not only strengthen the resilience of the borough through the sharing of resources but build upon an existing community network.

Telford and Wrekin Council:

- 4.8 The Council has already been very active in reacting and preparing for climate change events. However, there has been no overarching consideration of the impacts at a strategic level which this risk register provides.
- 4.9 The Council has already adopted climate adaptation measures to build resilience and maintain service provision, and the risk register will build on this foundation. Examples of measures implemented to date include:
- In 2019, the Council published a Sustainable Urban Drainage Systems (SUDs) handbook for developers.
 - In 2022, the Council adopted the Climate Change Supplementary Planning Document (SPD). The document includes guidance on site and building design including the provision of electric vehicle charging infrastructure, installing renewable energy technology, making development greener and using and managing our natural resources more efficiently.

Monitoring

- 4.10 Adaptation is an ongoing, iterative process. It is of note that there will be no final 'adapted state'; the risk register must always acknowledge changes in local climate impacts and accommodate the continued process of building adaptive capacity and resilience.
- 4.11 The risk register will be a document that is embedded into the Council's overall reporting process. Conversations with Policy and Governance are taking place to ensure that adaptation is included in appropriate mechanisms across the Council.

5.0 Alternative Options

5.1 The alternative would be to not produce a climate change adaptation risk register. This would however result in the Council failing to identify risks to its services and not having the ability to respond to emergencies in a timely, effective, and co-ordinated way. As a result, it would also lead to significant increase in costs and put pressure on service delivery in the future.

6.0 Risks

6.1 An independent assessment, the UK Climate Risk for the UK's third Climate Change Risk Assessment (CCRA3), published in June 2021⁹ sets out the priority climate change risks for the UK. In summary, risks in the report include:

- The impacts of climate change on the natural environment.
- An increase in the range, quantities, and consequences of pests, pathogens, and invasive species.
- The risk of climate change impacts, especially more frequent flooding, and coastal erosion, causing damage to infrastructure services.
- A reduction in public water supplies due to increasing periods of water scarcity.
- The impact of extreme temperatures, high winds, and lightning on the transport network.
- The impact of increasing high temperatures on people's health and wellbeing.
- Increased severity and frequency of flooding.
- Disruption to the delivery of health and social care services due to a greater frequency of extreme weather.
- Damage to cultural heritage assets as a result of temperature, precipitation, groundwater and landscape changes.
- Impacts internationally that may affect the UK, such as risks to food availability, safety and security, risks to international law and governance from climate change that will affect the UK, international trade routes, public health.

Therefore, there are significant risks as outlined should the Council fail to mitigate climate change and ensure that residents, businesses, and the natural environment are able to adapt to the future climate.

7.0 Council Priorities

7.1 The Council's work on climate change and sustainability is a direct response to the Council's priority "Our natural environment is protected, and the Council has a leading role in addressing the climate emergency". However, as a cross cutting agenda it also has a significant contribution towards all other Council priorities including:

- Every child, young person, and adult lives well in their community.

⁹ <https://www.ukclimaterisk.org/wp-content/uploads/2021/06/CCRA-Evidence-Report-England-Summary-Final.pdf>

- Everyone benefits from a thriving economy.
- All neighbourhoods are a great place to live.
- A community-focussed, innovative Council providing efficient, effective, and quality services.

8.0 Financial Implications

8.1 An approved allocation of £4m was included in the capital programme to support Climate Change initiatives; spend in previous years totalled £1.25m which leaves £2.75m available in 2023/24. However, this has been fully allocated to other schemes in the Council's Climate Change Action. Finance will provide support in relation to any bids for external funding as required.

9.0 Legal and HR Implications

9.1 The Climate Change Act 2008 (as amended) establishes a legally binding target to reduce the UK's greenhouse gas emissions by 100% by 2050 when compared with the 1990 baseline. At a local level, Section 19(1A) of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to include in their local plans, policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. In the management of its activities, provision of its services and performance of its functions, local Councils are in a position to play a vital role in meeting the challenges posed by climate change. The Council has wide scope to decide how best to address these challenges.

9.2 The Council has the legal power to undertake the activities set out in the report. Implementation of the proposals in this report may give rise to specific legal issues upon which specific legal advice will be provided as necessary.

9.3 There are no specific human resource implications arising from this report.

10.0 Ward Implications

10.1 This report has a borough wide impact.

11.0 Health, Social and Economic Implications

11.1 The impacts of climate change will continue to have a significant impact on the health and wellbeing of Telford and Wrekin's residents as well as on their social and economic wellbeing, as highlighted in Section 3 of this report. For example, July 2022 saw the highest temperatures on record. Heatwaves can lead to very serious health implications particularly for the most vulnerable¹⁰

12.0 Equality and Diversity Implications

¹⁰ [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(18\)30434-3/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(18)30434-3/fulltext)

12.1 The Council's Climate Change Risk Register takes account of the legal requirement to pay due regard to the aims of the Public Sector Equality Duty. Key to this is consideration of people's specific needs based on their protected characteristics.

People who share protected characteristics of age, race, ethnicity, and disability are often disproportionately affected by climate change and its consequences. This is true locally and internationally. Extreme weather events, for example heat waves most detrimentally affect older residents and those with pre-existing respiratory and cardiovascular conditions.

The success of our climate change activity relies on active participation by the whole community otherwise adaptation responses could worsen inequalities or create new ones in the future. Steps will be taken to make sure that future events are inclusive, and the differing needs of individuals are considered so that they can access activities and contribute effectively.

13.0 Climate Change and Environmental Implications

13.1 This report sets out how Telford and Wrekin Council is addressing the current and future impacts of climate change and is therefore a key mechanism to support the Council's climate change work.

14.0 Background Papers

- 1 [Telford and Wrekin Becoming Carbon Neutral and Plastic Free – October Cabinet 2023](#)

15.0 Appendices

- A Telford and Wrekin High Level Corporate Climate Change Risk Register

16.0 Report Sign Off

Signed off by	Date sent	Date signed off	Initials
Legal	03/04/2024	11/04/2024	EH
Finance	03/04/2024	10/04/2024	DR

This page is intentionally left blank

Appendix A - Telford and Wrekin High Level Corporate Climate Change Risk Register

Climate change adaptation refers to the process of building resilience against the current and predicted impacts of climate change.

To take a proactive, not reactive approach to climate adaptation, it is necessary that risks are identified, and measures are put in place to reduce their impact. The development of a Climate Change Risk Register forms a major part of this process.

This Corporate Climate Change Risk Register developed by Telford and Wrekin Council aims to identify the most critical risks that the Council's services and stakeholders will face. The register assesses the Council's risk to the current and predicted impacts of climate change using the four climate hazards as identified by the Met Office¹:

- Warmer, wetter winters
- Warmer, drier summers
- Extreme weather: heatwaves
- Extreme weather: flooding and storms

This Risk Register follows Telford and Wrekin Council's standard risk assessment method, ranking each risk using the 'likelihood' and 'impact' scoring matrixes (see below). Attached to each predicted risk is an accompanying mitigation measure. Predicted risks have then been given a revised likelihood and impact ranking to determine the effect of the mitigation measure if implemented. This allows the Council to determine the effect of the mitigation measure if implemented.

Telford & Wrekin Council Strategic Risk Register updated January 2019	
Definitions used in the risk register:	
<u>Likelihood of Risk Occurring</u>	
Occurrence	Description
Unlikely	Unlikely to ever occur
Rare	May occur only in exceptional circumstances
Likely	Will probably occur at some time
Almost certain	Is expected to occur in the foreseeable future

Figure 1: Likelihood scoring matrix.

¹ [UKCP18 Climate Change over land \(Met Office\)](#)

<u>Impact of Risk if it does Occur</u>					
Descriptor	Financial	Reputation	Physical	Environ- mental	Service
Insignificant	Low	No damage	None	None/ insignificant	No loss of service
Minor	<£50K	Minimal/ minimal media/ social media	Minor	Minor locally	Internal disruption only, no loss of service
Moderate	£50K to £1m	Extensive local media/social media	Violence or threats of serious injury requiring medical treatment	Moderate locally	Disruption/ loss of service less than 48 hours
Significant	£1m to £5m	National media/social media	Extensive/ multiple injuries	Major local impact	Disruption/ loss of service less than 7 days
Major	>£5m	Extensive national media (lead item)/social media	Extensive multiple injuries/ death	Major national/inter national	Severe disruption/ loss of service more than 7 days.

Figure 2: Impact scoring matrix

Climate Change Risk Register: High-level Risks

Ref	Hazard	Risk	Result	Likelihood without controls	Impact without controls	What are we going to do to manage the risk?	Likelihood with controls	Impact with controls
1.1	Severe weather: extreme heatwaves	Potential for roads to melt and deform	Additional maintenance expense on carriageway	Almost certain (Is expected to occur in the foreseeable future)	Significant	Incorporate Polymer Modified Binders within surfacing to increase the allowable range of the material and therefore decrease the likelihood of deformation.	Likely (Will probably occur at some time)	Moderate
1.2	Severe weather: extreme rainfall and storms	<p>Increased high wind events causes trees to come down on the highway, impacting the resilience of the network (connectivity).</p> <p>Increase flooding events will majorly impact the resilience of the highway network (connectivity), including:</p> <p>Increased rate of deterioration of roads. Physical damage to roads requiring repair.</p> <p>Working capacity of drains reduced leading to more frequent exceedance. Increased Land Drainage investigations and enforcement.</p> <p>Increased emergency response and deployment of flood barriers Increased number of enquiries from public.</p> <p>Reduced strategic development and delivery.</p>	<p>Additional demand on resources</p> <p>Additional maintenance expense on carriageway</p> <p>Reduced connectivity and mobility</p> <p>Increased numbers of property flooding</p> <p>Need to re-prioritise investment.</p>	Almost certain (Is expected to occur in the foreseeable future)	Significant	Prioritise the response within the resources available.	Almost certain (Is expected to occur in the foreseeable future)	Moderate

1.3	Severe weather: extreme heatwaves	Information and Digital Technology (IDT) issues: <ul style="list-style-type: none"> - Cabling - overheating of comms- rooms - switches infrastructure - impact to networks communication - voip call centres. - Schools power outages 	Disruption to the overall communications network. Increased pressure on Information and Digital Technology (IDT) team to resolve IT issues. Impact to staff wellbeing. Online council services unable to run.	Likely (Will probably occur at some time)	Moderate	Maintenance contracts for air-conditioning are up to date and services conducted regularly.	Likely (Will probably occur at some time)	Moderate
1.4	Warmer/drier summers	Increase in air particulates leads to worsening air quality.	Increase in respiratory illness increase in excess morbidity, mortality. School closure impact on communities, increase in demands on health care services – Telford and Wrekin may be impacted from pollution that arises outside its boundary.	Likely (Will probably occur at some time)	Significant	Education and awareness. Potential for changes in working patterns - starting earlier - longer midday breaks finishing later.	Rare (May occur only in exceptional circumstances)	Moderate
1.5	Warmer/drier summers	Mechanical cooling insufficient	An increase in cooling infrastructure (air conditioning installations) and energy consumption for cooling. Telford Ice rink cooling system fails. Significant loss of income if Ice rink closes. Increase costs of running cooling infrastructure/ replacing broken cooling infrastructure. More money is spent on energy and less on other services.	Almost certain (Is expected to occur in the foreseeable future)	Moderate	Temporary portable Air Conditioning units. Ensure new and refurbished buildings have sufficient systems to maintain the required environmental conditions. Switch to greener cheaper energies, fabric insulation. New buildings designed with greater insulation to avoid extremes heat or cold.	Likely (Will probably occur at some time)	Moderate

1.6	Severe weather: extreme rainfall and storms	<p>Damage to buildings roofs.</p> <p>Reduction/cancellation of services – reputational impact.</p> <p>Health and safety of outdoor activities.</p> <p>Access to facilities Staff being able to get into buildings.</p> <p>Damage to historic assets.</p>	<p>Building closures.</p> <p>Event cancellations.</p> <p>Increased construction specifications.</p> <p>Financial costs- viability and repairs.</p> <p>More at risk of deterioration.</p>	Almost certain (Is expected to occur in the foreseeable future)	Moderate	<p>Building condition surveys.</p> <p>Maintenance contracts. Facility checklists.</p> <p>Written operating procedures/risk assessments and emergency action plans.</p> <p>New developments chosen in suitable locations with good green and grey infrastructure (traditional stormwater infrastructure in the built environment).</p> <p>Effective policy to ensure sites are conditioned and infrastructure delivery.</p> <p>Manage council owned assets and review Risk Register.</p>	Likely (Will probably occur at some time)	Moderate
1.7	Severe weather: extreme heatwaves	Increase in potential of wildfires	<p>Property damage and risk to human life, increased air quality exceedances, increased use of water.</p> <p>Increase demand on services.</p> <p>Economic impact - property loss</p> <p>Evacuation of areas of housing.</p> <p>Cost of ongoing welfare support.</p>	Likely (Will probably occur at some time)	Significant	<p>Through planning ensure that all new builds have a fire break between boundary of site and open fields.</p> <p>Education and awareness raising - emergency planning preparedness.</p>	Rare (May occur only in exceptional circumstances)	Significant
1.8	Severe weather: extreme heatwaves	Health risks: Increase in heat stress	<p>Increased incidents of heat related health impacts/illnesses</p> <p>In particular, those who are vulnerable, elderly, those with heart and respiratory conditions and diabetes.</p>	Likely (Will probably occur at some time)	Significant	<p>Ensure that estate is equipped with cooling infrastructure - ideally powered by on-site renewables to reduce running costs</p> <p>Ensure vulnerable residents are supported in times of</p>	Rare (May occur only in exceptional circumstances)	Moderate

			<p>This is likely to be significant or catastrophic for people with care and support needs, families, and carers and on the workforce. Subsequent impact is that there will be an increase in demand on health and care services and the potential lack of capacity to deliver business as usual services and additional demand.</p> <p>Care settings close leaving vulnerable people without care. Care Home Market is usually at 94% occupancy so there are no alternative locations easily available.</p> <p>Care settings come to the council to increase fees to support installation of climate management systems.</p>			<p>extreme heat to reduce demand of NHS.</p> <p>Working with public health and health protection teams to promote ways to reduce heat stress – to staff and residents.</p>		
	<p>Severe weather: - extreme heatwaves - extreme rainfall and storms</p>	<p>Infrastructure risk: lack of access to health services</p>	<p>Due to current infrastructure challenges, travel and public transport options may be severely limited for residents.</p> <p>This will impact on their ability to receive timely support for their needs which will subsequently cause an increase in demand on health services as people are unable to receive the preventative support at the right time.</p> <p>This could also mean that people are unable to receive/access emergency care when needed which could result in death.</p>	<p>Almost certain (Is expected to occur in the foreseeable future)</p>	<p>Major</p>	<p>This forms part of the Council's emergency response, alongside the Integrated Care System. Guidance would be shared with all staff and promoted to residents about how to keep safe and access health services in potentially different ways.</p>	<p>Likely (Will probably occur at some time)</p>	<p>Major</p>

1.10	Severe weather: extreme heatwaves	Infrastructure risk: access to records limited due to server failure and / or computer failures due to overheating.	Employees are unable to view people's records to enable a full picture of the person's needs. Business Continuity Plans will be instigated which will include information at a point in time but long periods of time without records will have an impact on the person, their family and the people who are providing the care and support needed.	Likely (Will probably occur at some time)	Significant	This is part of the current Business Continuity Plans and procedures are already in place to ensure a copy is available should the servers fail.	Rare (May occur only in exceptional circumstances)	Significant
1.11	Severe weather: - extreme heatwaves - extreme rainfall and storms	Pressure on Health Systems – GP and Hospitals.	Increase risk of health complications and death in vulnerable people.	Almost certain (Is expected to occur in the foreseeable future)	Significant	This forms part of the Council's emergency response, alongside the Integrated Care System. Guidance would be shared with all staff and promoted to residents about how to keep safe and access health services in potentially different ways.	Almost certain (Is expected to occur in the foreseeable future)	Significant
1.12	Severe weather: extreme heatwaves	Heatwaves pose a health risk to vulnerable residents in the Borough, i.e. elderly and young children.	Increased cases of sunstroke/dehydration/heat-related deaths.	Almost certain (Is expected to occur in the foreseeable future)	Major	Work with Town and Parish Councils and other community organisations to identify the most vulnerable residents in their communities. Map and signpost cool spaces for community use. Work with Town and Parish Councils and other community organisations to promote this. Support the creation of a 'disaster pack' that is circulated to Members, alongside the delivery of an in-person 'deep dive' Members session that covers climate change, community impacts and adaptation.	Likely (Will probably occur at some time)	Moderate

						Support the creation of awareness and education materials for members on sunstroke/dehydration. Use a range of materials: online/postal/displays in community 'hubs' (i.e. libraries).		
1.13	Severe weather: extreme rainfall and storms	Flash flooding affecting areas away from rivers.	Residents/communities who are not experienced with flooding are significantly impacted due to ill-preparedness.	Almost certain (Is expected to occur in the foreseeable future)	Significant	<p>Town and Parish Councils/members to input into list of emergency flooding contacts for their areas.</p> <p>Support the creation of a 'disaster pack' that is circulated to Members, alongside the delivery of an in-person 'deep dive' Members session that covers climate change, community impacts and adaptation.</p> <p>Learn/knowledge share from wards who have more experience in adapting to flooding events (I.e., Ironbridge).</p> <p>Ensure disaster planning is in place for every ward.</p> <p>Members to help, where appropriate, with practical measures such as clearing drains.</p>	Likely (Will probably occur at some time)	Moderate
1.14	Hotter, drier summers	Increased risk of long-term drought/water shortages.	Long-term drought and water scarcity will impact everyone living and working in the Borough	Likely (Will probably occur at some time)	Significant	<p>Support in the creation of awareness and education materials for members that address water shortages to circulate within the community.</p> <p>Work alongside Town and Parish Councils and community organisations to encourage behaviour change</p>	Likely (Will probably occur at some time)	Moderate

						during periods of drought – e.g. water rationing. Encourage residents to collect water.		
--	--	--	--	--	--	--	--	--

This page is intentionally left blank