

COMMITTEE REPORT

Subject:	<i>Complaints Policies Report</i>
Committee:	<i>Full Council</i>
Item Number:	<i>17</i>
Date:	<i>13 July 2026</i>
Author:	<i>Janine Whitty, Head of Corporate and Interim Deputy CEO</i>
Report status:	<i>Decision</i>
Confidential / Exempt:	<i>No</i>

1. Report Summary

- 1.1. This report presents the updated Complaints Policy and revised Managing Unreasonable Complainant Behaviour Policy for approval. It outlines the principal amendments made to both documents to strengthen complaint handling arrangements, improve transparency, and support effective management of unreasonable complainant behaviour.

2. Recommendations

It is recommended that the Committee:

- 2.1. Approve the updated Complaints Policy. (Appendix A)
- 2.2. Approve the revised and renamed Managing Unreasonable Complainant Behaviour Policy. (Appendix B)
- 2.3. Note the Complaints Procedure (Appendix C), which has been implemented as an operational document for officers.

3. Background

- 3.1 The Complaints Policy was previously called the Complaints Procedure.
- 3.2 The Complaints Policy forms part of Salisbury City Council's framework for ensuring fair, consistent, and transparent handling of complaints across all services.
- 3.3 The Managing Unreasonable Complainant Behaviour Policy was previously titled the Dealing with Abusive Persistent or Vexatious Complaints and Complainants Policy, which follows on from the Complaints Policy.

- 3.4 The Managing Unreasonable Complainant Behaviour Policy sets out how the Council will decide which complainants are deemed to be unreasonably persistent or behave unreasonably, and what the Council will do in those circumstances.
- 3.5 Both policies were considered by the Governance, Policy & HR Committee on 23 March 2026, with proposed changes agreed.

4. Changes to the Complaints Policy

- 4.1. Appendix A. Complaints Policy is the renamed and updated document.
- 4.2. Key changes include clearer definitions, updated rules on anonymous complaints, stronger exclusions, strengthened complaint handling processes, enhanced record-keeping, and a new organisational learning requirement.
- 4.3. Minor updates to the policy can be seen in blue, and new text is highlighted in red.
- 4.4. The previous Complaints Procedure has been renamed as the Complaints Policy.
- 4.5. In addition, a new Complaints Procedure has been drafted and implemented as an operational document for officers to process complaints, which is included in Appendix C. for member's reference.

5. Managing Unreasonable Complainant Behaviour Policy

- 5.1. Appendix B. Managing Unreasonable Complainant Behaviour Policy is the renamed and updated document.
- 5.2. The change in policy name and content is to adopt a shift in terminology. Using the term "Vexatious complainant" could be criticized for focusing on the person's character, which can be discriminatory or fail to account for underlying vulnerabilities.
- 5.3. The revised policy uses new terminology such as "Unreasonable Complainant Behaviour," "Unreasonable Actions," or "Unreasonably Persistent Behaviour" which focuses on specific actions that hinder the organisation's ability to process a complaint efficiently.
- 5.4. New text and amendments in red include:
 - 5.4.1. Providing clearer guidance as to what the council considers as unacceptable behaviour and communication.
 - 5.4.2. What action is to be taken when actioning each stage 1, 2 and 3 of the formal warning.
 - 5.4.3. Considers possible reasonable adjustments and alternative communication arrangements for complainants before deciding whether restrictions are necessary.
 - 5.4.4. Confirms the Councils data protection obligations and record management requirements.
 - 5.4.5. A new Section 5.6.3 has been introduced to provide greater clarity on how the Council will manage instances of similar unreasonable complainant behaviour occurring within a 12-month period. This is the only additional amendment proposed since the policy was considered by the Governance, Policy & HR Committee.

- 5.5. Updates in blue reflect the changes in policy name, terminology, committee name for which the policy refers to, and that this process is to be managed by the Head of Corporate, instead of as previously by City Clerk.

6. Legal and Governance Considerations

- 6.1. Salisbury City Council has the power to adopt and maintain policies governing the administration of its affairs and the handling of complaints in accordance with its general governance responsibilities. The proposed policies provide a clear framework for the fair, consistent and transparent management of complaints received by the Council.
- 6.2 The policies support the Council's obligations in relation to administrative fairness, equality of access, data protection, records management and good governance. The Complaints Policy establishes a clear process for handling complaints, while the Managing Unreasonable Complainant Behaviour Policy provides a proportionate framework for managing behaviour that may impede the effective handling of complaints.
- 6.3 In accordance with the Salisbury City Councils current Standing Order Annex A. Scheme of Delegation, the Complaints Policies were first considered by the Governance, Policy & HR Committee, with final approval required by Full Council.
- 6.4 Failure to maintain clear and effective complaints arrangements could expose the Council to reputational, operational and governance risks. Adoption of the updated policies will help mitigate these risks and provide greater clarity for complainants, members and officers.

7. Strategic and Policy Alignment

- 7.1 The proposed policies support the Council's commitment to openness, accountability, continuous improvement and good governance.
- 7.2 Effective complaint handling enables the Council to identify learning opportunities, improve service delivery and maintain public confidence in Council services and decision-making. The introduction of a requirement to capture organisational learning strengthens this approach.
- 7.3 The policies complement the Council's wider governance framework, including its Data Protection, Information Governance and customer service arrangements
- 7.4 This policy review is in accordance with Salisbury City Councils Policy Management Policy and policy review schedule.

8. Implementation and Next Steps

- 8.1 Subject to Full Council approval, the following actions will be undertaken:
- a. The approved policies will be published on the Council's website.
 - b. Relevant officers will be informed of the policy changes and associated procedural requirements.
 - c. The revised policies and supporting procedure will be incorporated into the Council's governance documents and operational practices.
 - d. Any future training requirements arising from implementation will be identified and incorporated into officer development programmes.

8.2 The anticipated timetable is:

Milestone	Date
Full Council approval	13 July 2026
Publication of policies	July 2026
Officer briefing and implementation	July – August 2026
Review of effectiveness – in accordance with the Policy Management Policy	Refer to policy review schedule

8.3 Responsibility for implementation will sit with the Head of Corporate.

9. Additional Relevant Information

- 9.1 The Complaints Policy has been renamed from the former Complaints Procedure to better reflect its role as a corporate policy document. A separate operational Complaints Procedure has been developed for officer use and is included for members' information.
- 9.2 The revised Managing Unreasonable Complainant Behaviour Policy introduces updated terminology that focuses on behaviours rather than individuals, providing a more proportionate and objective framework for considering restrictions on contact where necessary.
- 9.3 The policy also introduces clearer guidance regarding unacceptable behaviour, formal warning stages, reasonable adjustments, record-keeping requirements and data protection responsibilities.

10. Implications

Implication Area	Impact	Comments / Mitigation
Financial	Low	No direct financial implications are anticipated. Any implementation, communication or training requirements can be met from existing budgets.
Legal	Medium	Supports compliance with principles of good governance, administrative fairness, equality considerations and data protection obligations.
Risk	Low	Adoption of clear complaint handling arrangements reduces governance, reputational and operational risks associated with inconsistent complaint management.
Personnel	Low	Officers may require awareness briefings regarding revised procedures and responsibilities.
Environmental Impact	None	No environmental impacts have been identified.
Equalities Impact Statement	Medium	The policies reinforce accessibility commitments and consideration of reasonable adjustments when handling complaints and managing complainant behaviour.
Community / Public Impact	Medium	Provides greater transparency and consistency in complaint handling, supporting public confidence in Council processes.
Procurement / Contractual	None	No procurement or contractual implications arise from the recommendations.
Property / Asset	None	No impact on Council land, buildings or assets.
Data Protection	Medium	The policies include enhanced requirements regarding record keeping, personal data handling and complaint records management.

11. Appendices / Background Papers

11.1 Appendix A – Complaints Policy

11.2 Appendix B – Managing Unreasonable Complainant Behaviour Policy

11.3 Appendix C – Complaints Procedure



Complaints Policy

Policy Number	Version	Owner	Policy Type	Dept.	Date Published	Review date	Review Team
POXXX	4	SCO	2	Corp	March '26	March '29	HOC
Policy Number	Version	Owner	Doc No.	PDF No.	Date Published	Review date	Review Team
CS006	3	CSM	40832	73598	Reviewed Sep 19	Sept 2022	Manager
CS006	2	CSM	40832	50765	Reviewed May '15	1 May '18	Manager
CS005	1	CSM	40832	45970	March '13	1 Mar '15	Manager

Distribution

Internal: All SCC Staff

External: Website / Councillors / Partners

Salisbury City Council - Complaints Policy

1. Introduction:

- 1.1. This complaints procedure is for all complaints to Salisbury City Council, whether these are minor, serious, informal or formal and apply to all services provided by Salisbury City Council. This procedure does not cover dissatisfaction with decisions properly made by Council, unless the concern relates to the way that decision was reached.
- 1.2. Separate arrangements as prescribed by law are in place in respect of Salisbury City Councillors. These arrangements are referred to in paragraph 7 below.
- 1.3. Salisbury City Council believes that complaints can provide useful information and feedback on the quality of our services, procedures and practices. The effective handling of complaints will help us to improve the services provided on behalf of residents, visitors and those working within Salisbury City.

2. Aim of this Policy:

- 2.1. The aim of this Complaint's Policy is to swiftly investigate all complaints in an impartial manner and to find a solution locally, whenever possible, to the satisfaction of both the complainant and Salisbury City Council.

3. Definition Of Complaints:

- 3.1. People's perceptions differ widely. It is therefore very difficult to give a precise definition of a complaint. However, for our purposes, a complaint is an expression of dissatisfaction about a service undertaken by Salisbury City Council or any of its employees' or contractors.
- 3.2. More specifically, a complaint is where:
 - 3.2.1. The Council has not done something it has a duty to do or normally does.
 - 3.2.2. The Council has done something it has no right to do or does not normally do as a matter of established practice.
 - 3.2.3. The conduct or behaviour of an employee or contractor is unsatisfactory.
 - 3.2.4. The established levels of service delivery are not reached.
 - 3.2.5. A person does not understand or is not informed of why or how a situation arose or exists.
 - 3.2.6. An adopted and known procedure is not followed.
 - 3.2.7. Maladministration is alleged.

3.3. Anonymous complaints will not normally be investigated. However, the Council may investigate an anonymous complaint if it contains sufficient detail to suggest a safeguarding concern, serious misconduct, or a clear public interest issue.

3.4. This policy does not apply to employee grievances (which are handled under the Council's HR Grievance Procedure), requests under the Freedom of Information Act, or complaints relating to third-party bodies.

4. What To Do If You Have A Complaint::

4.1. The first priority is to raise the issue with the City Council. To do this, please contact the Council. Your complaint can be made by telephone, email, in person or in writing, giving **all relevant** names, addresses and dates with as much information as possible. The appropriate details for contacting the City Council are:-

4.1.1. By telephone on 01722 342860;

4.1.2. **By email** complaints@salisburycitycouncil.gov.uk;

4.1.3. In person or by letter to The Guildhall, Market Place, Salisbury, SP1 1JH

4.1.4. Via the 'contact us' page of our website
www.salisburycitycouncil.gov.uk.

4.2. In many cases, it will be possible for an issue to be dealt with straight away and the source of the complaint resolved immediately.

4.3. For more complex issues, Salisbury City Council requires these to be put these in writing (**either email or letter**) so that a thorough investigation can be undertaken. Investigations will be dealt with as quickly as possible. You will receive a written acknowledgement of your complaint within 5 working days and a full response to your complaint will be provided as soon as possible.

4.4. Written or complex complaints will be referred to the relevant Head of Service for investigation. A draft response will be prepared and approved either by the Head of Service or another designated senior officer. If the matter cannot be resolved at this stage, it may be escalated to the Chief Executive Officer, and, if still unresolved, to the Mayor.

4.5. Salisbury City Council maintains a register of complaints showing dates, details of the complaint, complainant and the action taken to resolve the issue. Entries must be logged at each stage. Complaint records will be handled in accordance with the Council's Data Protection and Retention Policies. This register is available for all members of the Council to inspect. Serious complaints will be reported to Councillors by officers.

- 4.6. If the complaint involves the Chief Executive Officer personally, the complainant should address the complaint directly to the Mayor via the contact options listed above.

5. Putting Things Right:

- 5.1. If, following the investigation into the complaint, the Council is found to be at fault, every effort will be made to resolve the complaint to the satisfaction of the complainant.
- 5.2. Where subsequent actions or simply the passage of time prevents restitution, other actions may be appropriate which may include a local settlement. A local settlement is defined as action taken to restore a complainant to a situation he or she would have been in if the fault had not occurred.
- 5.3. When considering a local settlement, the remedy will need to be appropriate to the injustice and may be reduced where a complainant has contributed to the injustice suffered.

6. What If You Are Not Satisfied:

- 6.1. Unlike for District, County or Unitary Councils and Authorities, there is currently no external agency or government body which can investigate a complaint if you are not satisfied with the initial consideration of your complaint. However, if you are not satisfied with action taken by the Chief Executive Officer, you should write to the Mayor via our address or website. The Mayor will review the complaint, and all of the paperwork relating thereto, and if they believes it appropriate, will submit the complaint to a Committee of the Council for consideration. The Mayor's determination represents the final stage of the Council's complaints process.

- 6.2. In order to preserve any confidentiality issues, the Committee of the Council will normally deal with your complaint in private session and your details will not therefore be released publicly.

7. What If I Have a Complaint About the Behaviour of a Particular Councillor (or Councillors):

- 7.1. Councillors are required to observe a '[Code of Conduct](#)'. If you think that a unitary, town, parish or city councillor has not followed the Code, you can complain and Wiltshire Council will look into the matter.
- 7.2. Wiltshire Council (WC) has a special committee, called the Standards Committee, which is responsible for doing this.

8. How to Complain:

- 8.1. If you want to complain about the conduct of a Council Member, please use the Members Complaints Form, available on Wiltshire Council's website, and either email it to governance@wiltshire.gov.uk or print it off and post it to:

The Monitoring Officer
Wiltshire Council
Trowbridge
Wiltshire
BA14 8JN

- 8.2. When WC receives your complaint, they will arrange for members of the Standards Committee to meet and decide if they can deal with your complaint. This is called the Assessment Sub-Committee.
- 8.3. The Assessment Sub-Committee can only deal with complaints about the behaviour of a Member. It is not allowed to deal with complaints about things that are not covered by the Members' Code of Conduct. If you make a complaint to the Assessment Sub-Committee, it must be about why you think a Member has not followed the Code of Conduct.
- 8.4. After the Assessment Sub-Committee has considered whether your complaint appears to relate to the behaviour of a Member that may breach the Code of Conduct, they will contact you to let you know what action, if any, will be taken.
- 8.5. You can view the Local Assessment Criteria to find out more about the approach taken by the Assessment Sub-Committee in the assessment of complaints on Wiltshire Council's website, www.wiltshire.gov.uk.

9. What Type Of Behaviour Is Covered By The Code Of Conduct:

- 9.1. The Code of Conduct for SCC Councillors says:-

- 9.1.1. You are a member or co-opted member of Salisbury City Council and hence you shall have regard to the following principles - selflessness, integrity, objectivity, accountability, openness, honesty and leadership.
- 9.1.2. You must promote and support high standards of conduct when serving in your public post, in particular as characterised by the following requirements, by leadership and example.

Accordingly, when acting in your capacity as a member or co-opted member:

- 9.1.3. You must act solely in the public interest and should never improperly confer an advantage or disadvantage on any person or act to gain financial or other material benefits for yourself, your family, a friend or close associate.
- 9.1.4. You must not place yourself under a financial or other obligation to outside individuals or organisations that might seek to influence you in the performance of your official duties.
- 9.1.5. When carrying out your public duties you must make all choices, such as making public appointments, awarding contracts or recommending individuals for rewards or benefits, on merit.
- 9.1.6. You are accountable for your decisions to the public and you must co-operate fully with whatever scrutiny is appropriate to your office.
- 9.1.7. You must be as open as possible about your decisions and actions and the decisions and actions of your authority, and should be prepared to give reasons for those decisions and actions.
- 9.1.8. You must declare any private interests, both pecuniary and non-pecuniary, that relate to your public duties and must take steps to resolve any conflicts arising in a way that protects the public interest, including registering and declaring interests in a manner conforming with the procedures set out below.
- 9.1.9. You must, when using or authorising the use by others of the resources of your authority, ensure that such resources are not used improperly for political purposes (including party political purposes) and you must have regard to any applicable Local Authority Code of Publicity made under the Local Government Act 1986.

9.2. A full copy of the Code of Conduct is available from the Council's offices.

10. Assistance or Advice Relating to Procedures or a Complaint:

- 10.1. If you need any specific help or general guidance about the Council's procedures or about any specific complaint, please contact:
- 10.2. Chief Executive Officer, The Guildhall, Market Place, Salisbury, SP1 1JH
- 10.3. By telephone 01722 342860
- 10.4. Email corporate@salisburycitycouncil.gov.uk
- 10.5. Via our website at <http://www.salisburycitycouncil.gov.uk/>

- 10.6. The Council will provide the complaints procedure in alternative formats and make reasonable adjustments for complainants with specific access needs.

11. Organisational Learning and Reporting:

- 11.1. Corporate Services will maintain oversight of complaints data and produce an annual summary report highlighting themes, trends, and areas for improvement.
- 11.2. This process supports organisational learning, continuous improvement, and public transparency.



Managing Unreasonable Complainant Behaviour Policy

Renamed - Managing Unreasonable Complainant Behaviour Policy							
Policy Number	Version	Owner	Policy Type	Dept.	Date Published	Review Due	Review Team
POXXX	3	HOC	2	Corp	March '26	March '29	HOC
Previously - Dealing with Abusive, Persistent or Vexatious Complaints and Complainants Policy							
Policy Number	Version	Owner	Doc No.	PDF No.	Date Published	Review Due	Review Team
CS009	2	CC			July '17	July '21	Man
CS009	1	CC	42869	58536	Sept '13	May '17	Man

Distribution

Internal: All SCC Staff

External: Website/Councillors/Partners

Salisbury City Council - Managing Unreasonable Complainant Behaviour Policy

1. Introduction:

- 1.1. Salisbury City Council is committed to dealing with all complaints equitably, comprehensively, and in a timely manner. The Council will not normally limit the contact which complainants have with Council staff.
- 1.2. However, the Council does not expect staff to tolerate unacceptable behaviour by complainants or any customer. Unacceptable behaviour includes behaviour which is abusive, offensive or threatening, such as:
 - 1.2.1. Using abusive or foul language on the telephone
 - 1.2.2. Using abusive or foul language face to face
 - 1.2.3. ~~Sending multiple emails~~ Sending an excessive volume of emails, multiple emails about the same matter, after a response has been provided, in a way that hinders the effective handling of the complaint.
 - 1.2.4. ~~Leaving multiple voicemails~~ Leaving multiple voicemails, repeated voicemails about the same matter, after a response has been provided, in a way that places unreasonable demands on staff time and resources.
 - 1.2.5. ~~Sending multiple communications~~ Making repeated contact through multiple channels about various or the same matter, without new relevant information, in a way that disrupts service delivery or complaint handling.
- 1.3. Salisbury City Council will take action to protect staff from such behaviour. If a complainant behaves in a way that is unreasonably persistent or vexatious behaviour is unreasonable, the Council will follow this policy.
- 1.4. Dealing with a complaint can be a straightforward process, but in a minority of cases, people pursue their complaints in a way which can either impede the investigation of their complaint or can have significant resource issues for the Council. This can happen either while their complaint is being investigated, or once the Council has finished dealing with the complaint.
- 1.5. Raising legitimate queries or criticisms of a complaints policy and procedure as it progresses, for example if agreed timescales are not met, should not in itself lead to someone being regarded as a vexatious unreasonable behaviour or an unreasonably persistent complainant.
- 1.6. Similarly, the fact that a complainant is unhappy with the outcome of a complaint and seeks to challenge it should not necessarily cause them to be labelled as behaving unreasonably vexatious or being unreasonably persistent.
- 1.7. This policy also applies to complainants who are complaining to councillors who are acting as members of the Council.

2. Aim of this Policy:

- 2.1. The aim of this Policy is to contribute to our overall aim of dealing with all complainants in ways which are demonstrably consistent, fair and reasonable.
- 2.2. It sets out how the Council will decide which complainants will be treated as **behaving unreasonably** ~~vexatious~~ or unreasonably persistent, and what the Council will do in those circumstances. The policy is for the information of staff and Councillors, as well as complainants.

3. Definition of Unreasonable **Behaviour or Persistence** ~~Vexatious~~ from Complainants:

- 3.1. **Salisbury City** Council has adopted the **Local Government and Social Care Ombudsman (LGSCO)** definition of “unreasonable **actions by** complainants” and “unreasonable persistent complaints”
- 3.2. **Salisbury City** Council defines **unreasonable behaviour or persistence** ~~vexatious~~ complainants as those complainants who, because of the frequency or nature of their contacts with the Council, hinder our consideration of their or other people’s complaints. The description ‘unreasonably persistent’ and ‘~~vexatious~~ **unreasonable behaviour**’ may apply separately or jointly to a particular complainant.

4. Examples of Unreasonable Persistence and/or **Vexatious** Behaviours:

This list is not exhaustive, nor does one single feature on its own necessarily imply that the person will be considered as being in this category

- 4.1. Have insufficient or no grounds for their complaint and be making the complaint only to annoy (or for reasons that **they** do not admit or make obvious).
- 4.2. Refuse to specify the grounds of a complaint despite offers of assistance.
- 4.3. Refuse to co-operate with the complaints investigation process while still wishing their complaint to be resolved.
- 4.4. Refuse to accept that issues are not within the remit of the complaints policy and procedure despite having been provided with information about the scope of the policy and procedure.
- 4.5. Refuse to accept that issues are not within the power of the Council to investigate, change or influence (for example something that is the responsibility of another organisation).
- 4.6. Insist on the complaint being dealt with in ways which are incompatible with the complaints procedure or with good practice (insisting, for instance, that there must not be any written record of the complaint).

- 4.7. Make what appear to be groundless complaints about the staff dealing with the complaints and seek to have them dismissed or replaced.
- 4.8. Make an unreasonable number of contacts with us, by any means in relation to a specific complaint or complaints.
- 4.9. Make persistent and unreasonable demands or expectations of staff and/or the complaints process after the unreasonableness has been explained to the complainant (an example of this could be a complainant who insists on immediate responses to numerous, frequent and/or complex letters, faxes, telephone calls or emails).
- 4.10. Harass or verbally abuse or otherwise seek to intimidate staff dealing with their complaint, in relation to their complaint by use of foul or inappropriate language or by the use of offensive or racist language.
- 4.11. Raise subsidiary or new issues whilst a complaint is being addressed that were not part of the complaint at the start of the [complaint policy and procedure](#).
- 4.12. Introduce trivial or irrelevant new information whilst the complaint is being investigated and expect this to be taken into account and commented on.
- 4.13. Change the substance or basis of the complaint without reasonable justification whilst the complaint is being addressed.
- 4.14. Deny statements [they](#) made at an earlier stage in the complaint process.
- 4.15. Electronically record meetings and conversations without the prior knowledge and consent of the other person(s) involved.
- 4.16. Adopt an excessively 'scattergun' approach, for instance, pursuing a complaint or complaints not only with the council, but at the same time with a Member of Parliament, other councils, elected councillors of this and other councils, the council's independent auditor, the police, solicitors, and the Local Government Ombudsman.
- 4.17. Refuse to accept the outcome of the complaint process after its conclusion, repeatedly arguing the point, complaining about the outcome, and/or denying that an adequate response has been given.
- 4.18. Make the same complaint repeatedly, perhaps with minor differences, after the complaints procedure has been concluded, and insist that the minor differences make these 'new' complaints which should be put through the full complaints procedure.
- 4.19. Persistently approach the council through different routes about the same issue.
- 4.20. Persist in seeking an outcome which the Council have explained is unrealistic for legal or policy (or other valid) reasons.

- 4.21. Refuse to accept documented evidence as factual.
- 4.22. Complain about or challenge an issue based on a historic and irreversible decision or incident.
- 4.23. Combine some or all of these features.

5. Managing Unreasonable Behaviours and/or Persistence Vexatious from Complainants:

5.1. Review and Investigation

- 5.1.1. Before any action is taken, the **Head of Corporate** will ensure that the complaint is being, or has been, investigated properly according to the Council's agreed Complaints Policy and Complaints Procedure.
- 5.1.2. In considering whether this policy should be applied, the **Head of Corporate** will also consider whether the complainant may have a disability, vulnerability, communication need, or other relevant circumstance which may affect how they access or engage with the complaints process. Where appropriate, the Council will consider reasonable adjustments and alternative communication arrangements before deciding whether restrictions are necessary.
- 5.1.3. When a complainant begins to demonstrate behaviours such as listed above, the **Head of Corporate** will consult with the Chairman, Leader of the Council and Chair of the **Governance, Policy & HR Committee**. The **Head of Corporate** will provide sufficient information to them for them to determine whether the complaint fulfils the definition as shown above. If it is agreed that the complaint fulfils the definition the **Head of Corporate** will issue a warning to the complainant about their behaviours.
- 5.1.4. The **Head of Corporate** will do so by contacting the complainant either by phone, in writing or by email to explain why this behaviour is causing concern, and ask them to change this behaviour. The **Head of Corporate** will explain the actions that the Council may take if the behaviour does not change, which may include the implementation of the 3-stage warning process.

5.2. Stage 1 Formal Warning

- 5.2.1. If the disruptive behaviour continues, the **Head of Corporate** will issue a reminder letter to the complainant advising them that the way in which they will be allowed to contact us in future will be restricted.
- 5.2.2. This may request that they no longer submit further correspondence on concluded or matters that are being investigated.

5.3. Stage 2 Formal Warning

- 5.3.1. If following this letter, the behaviour continues, the **Head of Corporate** will inform the Chairman, Leader of the Council and Chair **Governance, Policy & HR Committee**. They will then determine what restrictions are

- to be imposed on the complainant and for how long. This will be communicated to the complainant in writing.
- 5.3.2. Any restriction that is imposed on the complainant's contact with the Council will be appropriate and proportionate and the complainant will be advised of the period of time the restriction will be in place for. In most cases restrictions will apply for between 3 and 6 months but in exceptional cases may be extended. In such cases the restrictions would be reviewed on an annual basis.
 - 5.3.3. In the event of the Chairman being actively involved in investigating a complaint under the Complaints Policy, the consultation and decision-making process will fall to the Leader of the Council and the Chair of the [Governance, Policy & HR Committee](#).

5.4. Possible Stage 2 Complainant Restrictions

- 5.4.1. Restrictions will be tailored to deal with the individual circumstances of the complainant and may include:
 - 5.4.1.1. Banning the complainant from making contact by telephone except through a third party e.g. solicitor/councillor/friend acting on their behalf
 - 5.4.1.2. Banning the complainant from sending emails to individuals and/or all Council officers and insisting they only correspond by letter
 - 5.4.1.3. Banning the complainant from using any of the Council's services
 - 5.4.1.4. Banning the complainant from accessing any Council building except by appointment
 - 5.4.1.5. Requiring contact to take place with one named member of staff only
 - 5.4.1.6. Restricting telephone calls to specified days / times / duration.
 - 5.4.1.7. Requiring any personal contact to take place in the presence of an appropriate witness.
 - 5.4.1.8. Letting the complainant know that the Council will not reply to or acknowledge any further contact from them on the specific topic of that complaint (in this case, a designated member of staff should be identified who will read future correspondence, this will usually be the [Head of Corporate or Corporate Manager](#)).

5.5. Notifying the Complainant

- 5.5.1. When the decision has been taken to apply this policy to a complainant, the [Head of Corporate](#) will contact the complainant in writing to explain:
 - 5.5.1.1. Why the Council have taken the decision,
 - 5.5.1.2. What action the Council are taking,
 - 5.5.1.3. The duration of that action,
 - 5.5.1.4. The review process of this policy, and
 - 5.5.1.5. The [Head of Corporate](#) will enclose a copy of this policy in the letter to the complainant.

5.6. Stage 3 Formal Warning

- 5.6.1. Where a complainant continues to behave in a way which is unacceptable, the [Head of Corporate](#), in consultation with the Chairman, Leader of the Council and Chair of the [Governance, Policy & HR Committee](#), may decide to refuse all contact with the complainant and stop any investigation into [their](#) complaint.
- 5.6.2. Where the behaviour is so extreme or it threatens the immediate safety and welfare of staff, the Council will consider other options, for example reporting the matter to the Police or taking legal action. In such cases, the Council may not give the complainant prior warning of that action.
- 5.6.3. Where a complainant who has previously been subject to restrictions under this policy resumes the same or substantially similar behaviour within 12 months of the expiry of those restrictions, the Council reserves the right to reapply restrictions immediately and without repeating earlier stages of this procedure, where it is reasonable and proportionate to do so.

6. New Complaints from [Unreasonable](#) Complainants who are Treated as Abusive, Vexatious:

- 6.1. New complaints from people who have come under this Policy will be treated on their merits. The [Head of Corporate](#) will decide whether any restrictions which have been applied before are still appropriate and necessary in relation to the new complaint. The Council do not support a “blanket policy” of ignoring genuine service requests or complaints where they are founded.
- 6.2. The fact that a complainant is judged to be unreasonably persistent or [behaviour has been unreasonable](#) ~~vexatious~~, and any restrictions imposed on our contact with [them](#), will be recorded and notified to those who need to know within the Council.

7. [Formal Warning Status](#) Review:

- 7.1. The status of a complainant judged to be [unreasonably persistent or to behave unreasonably](#) ~~vexatious~~ will be reviewed by the [Head of Corporate](#) after three months and at the end of every subsequent three months within the period during which the Policy is to apply.
- 7.2. The complainant will be informed of the result of this review if the decision to apply this Policy to them has been changed or extended.

8. Record Keeping:

- 8.1. Adequate records will be retained by the [Head of Corporate](#) of the details of the case and the action that has been taken. The [Head of Corporate](#) will retain a record of:
 - 8.1.1. The name and address of each person who has been identified as behaving [unreasonably or unreasonably persistent](#) ~~abusive, vexatious or persistent~~

8.1.2. When the restriction came into force and ends

8.1.3. What the restrictions are

8.1.4. When the customer and departments were advised

8.1.5. Information recorded under this policy will be retained and shared only where necessary for the purposes of managing unreasonable complainant behaviour, on a need-to-know basis, and in accordance with the Council's data protection obligations and records retention requirements.

8.2. The [Head of Corporate](#) will provide with an annual report giving information about customers who have been treated as ~~vexatious~~ [unreasonable](#)/persistent as per this Policy to the [Governance, Policy & HR Committee](#).



Complaints Procedure

Procedure / Number .../PRG/...	Policy Number (that PRG attached to)	Version	Owner	Doc No.	PDF No.	Date Published	Review date	Review Team
CS/PRG/007								

Distribution

Internal: All SCC Staff

External: Website

1. Introduction

This procedure lays out how complaints will be dealt with at Salisbury City Council. It should be read alongside the following reference documents.

Reference Documents:

- [Complaints Policy \(Draft\)](#)
- [Complaints Flowchart 2025](#)
- [Complaints Register](#)

2. Purpose

The purpose of this Complaints Procedure is to ensure that all complaints are handled in a consistent and efficient manner. It also ensures that all Heads of Services have oversight of complaints about their departments' services and have input into the responses sent to the customer.

This procedure applies to complaints about services, actions, decisions, or conduct of Salisbury City Council.

The following matters are not handled under this Complaints Procedure and must be managed under the relevant process:

- Freedom of Information (FOI) or Environmental Information Regulations (EIR) requests
- Subject Access Requests (data protection requests)
- Employment grievances or internal HR matters
- Insurance claims or legal claims against the Council
- Statutory appeals (e.g. planning or licensing decisions where a formal right of appeal exists)

Where a matter falls outside this procedure, the complainant will be directed to the appropriate process.

3. Procedure

The Senior Corporate Officer or, in their absence, the Head of Corporate Services, will:

- Allocate complaints received via the Complaints Inbox to the Corporate Support Officer working folder
- Notify the Corporate Support Officer that the complaint is ready to be processed

The Head of Corporate Services and the Senior Corporate Officer will be responsible for managing vexatious or abusive complaints and any complaints made against named officers.

Once a complaint is allocated to the Corporate Support Officer, follow the steps below.

Step 1	<u>Identify That It Is a Complaint</u>
Step 1A	<u>Is it about Salisbury City Council?</u>
Step 2	<u>Log the Complaint in the <i>Complaints Register</i></u>
Step 3	<u>Acknowledgement – Must Be Sent Within 5 Working Days</u>
Step 4	<u>Allocate the Complaint for Investigation</u>
Step 5	<u>Carry Out the Investigation</u>
Step 6	<u>Draft the Response</u>
Step 7	<u>Approval and Sending the Response</u>
Step 8	<u>If the Complainant Is Not Satisfied</u>

Roles used in this procedure

- **Corporate Support Officer:** logs the complaint, coordinates the process, drafts responses, and updates the Complaints Register.
- **Senior Corporate Officer:** compliance check, oversight of sensitive complaints, and escalation handling.
- **Head of Corporate Services:** acts in the Senior Corporate Officer's absence and supports oversight of sensitive complaints.
- **Investigating Officer / Head of Service:** investigates and provides findings for the relevant service area.
- **Chief Executive Officer:** decides escalation outcomes.
- **Mayor:** makes the final determination where the complaint is escalated to the final stage under this procedure.

Step 1: Identify That It Is a Complaint

When someone contacts the Council, first decide whether it is a complaint or a request for service/enquiry.

A complaint is where someone expresses dissatisfaction about:

- A service the Council provides or failed to provide
- The conduct or behaviour of an employee or contractor or Councillor

- A decision or action taken by Officers (not a “properly made” Council or Committee decision)
- Whether a procedure was followed correctly
- Perceived unfair treatment or maladministration

If the correspondence is disagreement with a properly made Council or Committee decision (rather than service failure), treat it as feedback and explain the relevant decision process (for example, how decisions are made, and whether there is any formal review route).

Service request / enquiry (not a complaint):

This is where someone is asking the Council to do something (e.g. report a problem, request information, request a booking change) and they are not expressing dissatisfaction about how the Council has acted.

If it is a service request/enquiry:

- Handle it as normal service work (or pass to the relevant service area)
- Do not log it as a complaint in the Complaints Register (unless the person clearly indicates dissatisfaction with Council action/service failure)
- If the person later expresses dissatisfaction with how it was handled, treat that correspondence as a complaint and proceed to Step 2

Step 1A: Is it about Salisbury City Council?

Yes → Continue to [Step 2](#)

No → Treat as “***Complaint About Other Bodies***” below

Complaints About Other Bodies

If Salisbury City Council is not responsible for the issue, it should not be treated as an SCC complaint. However, we must still be helpful and clear.

If SCC is not responsible for the issue:

- Do not treat it as an SCC complaint
- Advise the resident which organisation they must contact (e.g. Wiltshire Council, Police, National Highways, Housing Provider, Utility Company)
- Provide the correct contact details where possible
- Record the entry as “Not SCC” and close

Complaints About Councillor Conduct

If the complaint concerns a Councillor’s behaviour under the Code of Conduct:

- Advise the person that these must be sent to Wiltshire Council’s Monitoring Officer
- Direct them to: governance@wiltshire.gov.uk

- Still log on the Complaints Register and record the entry as “Referred to WC Monitoring Officer”

Anonymous Complaints

Anonymous complaints are normally not investigated unless they include:

- Safeguarding concerns
- Health & safety risks
- Serious misconduct
- Significant public interest issues

Do not investigate or take any action on an anonymous complaint unless you have been specifically instructed to do so by the Senior Corporate Officer or Head of Corporate Services.

Step 2: Log the Complaint in the [Complaints Register](#)

The Corporate Support Officer must create/update an entry in the Complaints Register as soon as practicable (same working day where possible).

Record:

- Date received
- How it was received
- Complainant details
- Subject
- Responsible service area
- Acknowledgement due date (5 working days) (if applicable)
- Full response due date (20 working days)

For the purpose of this procedure, “Day 1” is the first working day after the complaint is received. If a complaint is received outside normal working hours, it will be treated as received on the next working day.

Update the Complaints Register at every stage:

- Allocation
- Acknowledgement sent
- Investigation actions
- Response sent
- Escalation to CEO/Mayor
- Final outcome

Close the entry only when the case is fully concluded.

Step 3 - Acknowledgement – Must Be Sent Within 5 Working Days

Automatic acknowledgement (Complaints Inbox):

The Complaints Inbox will issue an automatic email acknowledgement confirming receipt and stating that the Council will aim to provide a full response within 20 working days.

This automatic acknowledgement replaces the need for a separate “holding reply” for email complaints sent to the Complaints Inbox.

Non-email / other routes:

Where a complaint is received by post, phone, in person, or via another inbox without an autoreply, the Corporate Support Officer must send a brief written acknowledgement within 5 working days, confirming that:

- The complaint has been received
- It will be investigated under the Complaints Procedure
- A full response will normally be provided within 20 working days

If it is not possible to provide a full response within 20 working days, the Corporate Support Officer must notify the complainant before the 20-working-day deadline. The update must explain the reason for the delay and provide a revised response date.

Update the Complaints Register with details of the acknowledgement (auto or manual).

Step 4: Allocate the Complaint for Investigation

Corporate Support Officer must:

- Identify the correct service area relating to the complaint
- Refer the complaint to the appropriate department Investigating Officer or The Head of Service (if appropriate)
- For multi-service complaints, agree a lead Head of Service
- Review the full complaint and identify each issue raised, and provide this summary to the Investigating Officer.

Step 5: Carry Out the Investigation

The Investigating Officer/Head of Service must:

Gather evidence:

- Case records and emails
- Policies and procedures
- Photographs, reports, contractor notes
- Staff accounts/statements

Assess:

- Were policies followed?
- Were service standards met?
- Were delays or errors caused by SCC?

Decide an outcome for each issue:

- Upheld
- Partially upheld
- Not upheld

Identify remedies or learning actions:

- Apology
- Fixing the issue now
- Reviewing procedures
- Staff training/reminders
- Local settlement where appropriate

Provide the findings summary back to the Corporate Support Officer

The Corporate Support Officer then updates the [Complaints Register](#)

Step 6: Draft the Response

The Corporate Support Officer prepares the draft response with input from the Investigating Officer/Head of Service.

The response must:

- Thank the complainant for their correspondence
- Summarise what they complained about
- Explain what was investigated
- Set out the findings in plain, neutral language
- State whether each issue is upheld, partially upheld, or not upheld
- Apologise where the Council is at fault
- Explain what actions will be taken
- Set out next steps if they remain dissatisfied

Step 7: Approval and Sending the Response

Before sending:

- Email the full complaint chain including a link to the draft response (held on Aline) to the Senior Corporate Officer for compliance checks
- Once the Senior Corporate Officer has checked the response then forward to the appropriate Head of Service for final Approval

Once approved:

- Corporate Support Officer sends the response (email or letter)
- Update the Complaints Register (date sent, outcome, actions required, link to response document)

Step 8: If the Complainant Is Not Satisfied

Chief Executive Officer Review (CEO)

If a complainant remains dissatisfied after receiving the response, they may request escalation in accordance with the below.

Corporate Support Officer

Forward the full complaint chain, evidence pack and the response to the Senior Corporate Officer (SCO).

Update the Complaints Register to show “Escalated to CEO Review” and record the date the escalation was requested/received.

Senior Corporate Officer (SCO)

Confirm whether CEO Review is appropriate (e.g. new evidence, material disagreement with findings, service failure concerns, or unresolved outcomes).

If accepted for CEO Review, send the pack to the CEO with a short covering note summarising:

- the complaint issues raised by the complainant
- outcomes for each issue (upheld/partially/not upheld)
- outstanding points raised by the complainant
- any remedies already offered and actions underway
- any risk/sensitivity (e.g. staff conduct, legal, media interest)

Chief Executive Officer Review (CEO)

Review the full complaint file (original complaint, evidence, investigation summary, response, and the complainant's escalation points).

Decide whether:

- to uphold / partially uphold / not uphold each outstanding issue, and/or
- to confirm the decision, and/or
- to propose additional remedy/learning actions.

Provide a written determination to the Corporate Support Officer/SCO for drafting into the response.

Confirm whether the matter should proceed to Mayor Review if the complainant remains dissatisfied.

Corporate Support Officer

Draft the response on Aline based on the CEO determination.

Send to SCO for compliance check, then to CEO for final approval (if required).

Issue the response to the complainant and update the Complaints Register (date sent, outcomes, actions, link to final response).

Mayor Review (Final Stage)

If the complainant remains dissatisfied after CEO Review (or where the policy/procedure requires Mayor involvement):

Corporate Support Officer

Forward the complete complaint pack (including CEO determination and response) to the SCO.

Update the Complaints Register to show "Escalated to Mayor Review (Final Stage)" and record the date.

Senior Corporate Officer (SCO)

Provide the Mayor with the full pack and a short briefing note:

- Summary of the complaint and the escalation points
- Response outcomes

- Any remaining disputed issues
- Any confidentiality sensitivities (staff matters / exempt information)
- Recommended options for closing the matter.

Mayor

Review the complaint and all supporting paperwork.

Make a final determination on the remaining issues (confirming or amending prior outcomes and any remedy/learning actions).

Where the Mayor believes it appropriate, the Mayor may refer the complaint to a Committee of the Council for consideration.

Any such Committee consideration should normally be in private session to preserve confidentiality.

The Mayor's determination represents the final stage of the Council's internal complaints process.

In most circumstances, complaints about parish and town councils are not investigated by the Local Government and Social Care Ombudsman. However, complainants remain entitled to seek independent advice regarding any external remedies that may be available to them.

Corporate Support Officer

Draft the final response reflecting the Mayor's determination (and any Committee outcome where applicable).

Send to SCO for compliance check and then for Mayor approval/sign-off (as required locally).

Issue the final response and update the Complaints Register (final outcome, date closed, actions and learning logged).

Complaints Process Flowchart

