



NORTHERN IRELAND SOCIAL CARE COUNCIL

COMPLAINTS POLICY

(Includes NISCC's Unacceptable Actions Policy)

V2.0

FEBRUARY 2017

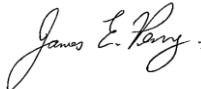
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Lead Director	Director of Registration and Corporate Services
Author(s)	Sandra Stranaghan, Policy and Operations Manager
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Approvals

Date	Document Version	Approver Name and Title	Approver Signature
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NORTHERN IRELAND SOCIAL CARE COUNCIL

COMPLAINTS POLICY

1. Introduction

1.1 The Northern Ireland Social Care Council (NISCC) was established in 2001, under the Health and Personal Social Services Act (NI) 2001. It is an Arms' Length Body, sponsored by the Department of Health in Northern Ireland. It is responsible for the registration and regulation of the Social Care Workforce which comprises around 35,000 people who work in a range of social care services (social work, social care, and also people studying for a Degree in Social Work). NISCC has three overarching strategic objectives which are to –

- Improve the quality of social care and promote a safe social care workforce through workforce regulation;
- Ensure that qualifications and standards deliver a skilled and committed Social Care Workforce;
- Raise awareness and knowledge of the work of NISCC and ensure its work is informed and influenced by users of social care services, carers, registrants, employers and other stakeholders.

1.2 NISCC is based in Millennium House, 7th Floor, Great Victoria Street, Belfast. It employs around 60 staff, a number of whom work on a part-time basis. All staff are required to apply and demonstrate NISCC's Values and Behaviours which underpin delivering a high quality service to all its stakeholders, including registrants, service users and carers (these can be found on its website at www.niscc.info).

2. Complaints Management

2.1 NISCC strives at all times to deliver high quality services in all aspects of its business and works to identify how improvements can be made on an on-going basis. NISCC recognises that sometimes things can go wrong and when this happens it is in everyone's best interest to resolve concerns and complaints at the earliest possible stage. This Policy is therefore designed to encourage early and local resolution of complaints at the front line but also puts in place a system to investigate and resolve complaints where local resolution has not worked, for whatever reason.

2.2 It is also important that NISCC learns from its experiences and mistakes and uses the feedback from complaints in a positive way to improve its services for everyone. NISCC therefore uses this Policy to embed learning from complaints into its processes, culture and development for all staff.

- 2.3 Complaints can come from a range of sources and may be related to processes, systems, or NISCC staff. NISCC also has an important role to play in investigating concerns raised in relation to the social care workforce ('registrants') however this Policy does not extend to complaints about the social care workforce. Such complaints should be raised under the Fitness to Practise procedures. Information on how to do this and who to contact can be found on our website at www.niscc.info including the leaflet 'Raising a Fitness to Practise Concern About a Worker'. If you do not have access to the Internet, copies can be obtained by contacting the NISCC Fitness to Practise team at NISCC (see contacts at the end).
- 2.4 NISCC is continually evolving and values complaints as a way in which it can learn and develop and improve its services across all parts of its business. NISCC has created a Customer Services Team to support its interactions with its customers and uses not only complaints but other forms of feedback to ensure it is delivering the right services in the right way. This Complaints Policy is part of that system and provides a clear, accessible and accountable system for ensuring complaints are managed in a timely, consistent and effective manner.

3. Responsibilities for Complaints Management in the NISCC

- 3.1 All staff within NISCC have a responsibility for the effective and efficient resolution of complaints in support this Complaints Policy and to respond to complaints in a positive way. In addition there are also designated roles and responsibilities to support complaints management within NISCC –
- NISCC Council are responsible for ensuring there is an effective complaints policy in place and that complaints are monitored, reported on, and lessons learnt;
 - NISCC's Chief Executive has overall responsibility for the Complaints Policy and ensuring its effective application;
 - NISCC's Director of Registration and Corporate Services has been designated by the Chief Executive to be responsible for the review of complaints, and ensuring the implementation and operation of the Complaints Policy, including ensuring administrative errors are put right and flaws in processes are remedied;
 - NISCC's Policy and Operations Manager has been designated NISCC's Complaints Manager and will investigate, review and report on complaints and ensure staff are adequately trained.

3. What is a Complaint?

- 3.1 NISCC considers that ***a complaint is any oral or written expression of dissatisfaction by any person, however made, about the service, actions or inactions of NISCC or its staff which requires a response.*** NISCC also recognises the benefits of getting it right first time and this applies to how concerns are dealt with across NISCC.

- 3.2 As explained above, complaints or concerns in relation to the social care workforce are not covered by this Policy and are instead managed through the Fitness to Practise procedures.
- 3.3 Normally complaints should be submitted within 6 months of the event occurring however delayed complaints may be considered by NISCC depending on the nature of the complaint and the reasons for the delay.
- 3.4 Any person, or organisation/body, who raises a request under NISCC's Access to Information Policy (Freedom of Information and/or Data Protection) who is unsatisfied with the response under that Policy can appeal under the Access to Information Policy. The Complaints Policy does not cover complaints in relation to Freedom of Information or Data Protection as the Access to Information Policy includes scope for appeal/further resolution including raising concerns with the Information Commissioner. A copy of this Policy can be found on NISCC's website at www.niscc.info.
- 3.5 It is important that the person impacted by the service/incident (in whichever form) is the person who makes the complaint to NISCC, however sometimes that may not be possible and a third party may need to make a complaint on the person's behalf. In those circumstances it is important for data protection purposes that the aggrieved individual provides clear written authority to NISCC that they have designated a person to act on their behalf or, if relevant, a copy of the Power of Attorney.
- 3.6 NISCC staff who have concerns should raise these internally through already existing NISCC policies including the Grievance Procedure and Whistleblowing Policy rather than the Complaints Policy.

4. Policy Aims

- 4.1 NISCC's Complaints Policy aims to –
- Seek to resolve problems/provide redress by informal means at an appropriate level wherever possible, and provide a straightforward and accessible means of resolution where informal means do not work;
 - Assist NISCC in improving its services by learning from the feedback, experiences and concerns of its stakeholders, customers and others;
 - Protect the rights and confidentiality of those who raise concerns with NISCC;
 - Ensure that senior management are informed of issues being raised through complaints so that services can be improved;
 - Provide consistent equal treatment of all persons who raise concerns through this Policy with NISCC.

5. Complaints Procedure

Informal Complaints

- 5.1 The best way to resolve most complaints or concerns is informally and directly with the member of staff in NISCC who is providing the service. NISCC refers to this as 'local resolution'. Most often these complaints take the form of phone calls, face to face contact or email. NISCC staff have been trained in managing complaints including the benefits to all parties of resolving concerns quickly and efficiently at local level.
- 5.2 If the informal complaint is about the behaviour of a member of staff, a line manager or more senior manager may deal with the individual directly. A line manager assisting with the complaint at local level might also occur if the staff member is on leave or if the person raising the concern would rather speak to another member of staff.
- 5.3 It is important that lessons learnt through this informal process are shared and changes made where these are relevant. For this reason NISCC staff are required to note any informal complaints as an '*expression of dissatisfaction*' so that outcomes from these complaints continue to inform service delivery and are not repeated.

Formal Complaints

- 5.4 There may be times when an individual is not satisfied with how their concerns were managed under the informal complaints procedure (above) or it may be that they wish to elevate their concern directly under the formal complaints procedure.

- 5.5 There are **2 stages** in NISCC's formal complaints procedure –

How to Make a Formal Complaint – Stage 1

- 5.6 If an individual wants to raise a complaint under the formal complaints procedure they can do so in a number of ways –
 - They can inform NISCC staff member who they have been dealing with under the informal stage above in which case the member of staff will supply the individual with the NISCC Complaints form (by email or hard copy). A copy of this Policy will accompany the Complaints form;
 - The individual can email NISCC directly at info@niscc.hscni.net and detail their complaint by email.
 - The individual can write to NISCC.
- 5.7 Complaints in the NISCC are managed by the **Complaints Manager**, Sandra Stranaghan. The Complaints Manager is responsible for –

- Investigating complaints raised under stage 1 of the formal procedure;
- Reviewing the outcome of complaints received under the informal procedure;
- Ensuring compliance with the Complaints Policy;
- Ensuring lessons learnt are shared as relevant across NISCC;
- Ensuring changes to process/systems take place as relevant;
- Reporting the outcome of complaints to the Senior Management Team on a regular basis;
- Ensuring the outcome of complaints are reflected if required in NISCC Risk Register;
- Immediately elevate serious complaints (for example but not limited to allegations of fraud or illegal activity, major breach of statutory obligations) to the Director of Registration and Corporate Services in NISCC.

5.8 Once a formal complaint is received it will be acknowledged within **2 working days** (this will be by email or in hard copy depending on how the original complaint was received or as indicated as the preference by the complainant).

5.9 The Complaints Manager will aim to respond to the complaint within **20 working days**. A number of complaints can be responded to sooner than this and NISCC will try to resolve formal complaints as quickly as possible.

5.10 To resolve complaints the Complaints Manager may need to contact the individual directly for additional information or clarity. This will be within the 20 working day timeframe. In addition, the Complaints Manager may decide that an alternative form of resolution is required depending on the nature of the complaint e.g. mediation, face to face meeting.

5.11 It is important that formal complaints to NISCC are made in writing and contain the detail of the issue being raised. This is so complaints can be fully understood and the matters investigated promptly. There may be times however that due to reasons such as disability that a complaint cannot be made in writing. In these circumstances the Complaints Manager will work with the individual (this may include a meeting) to best understand the issues being raised. In these circumstances the Complaints Manager may not be able to provide an immediate response at this meeting as these discussions are about information gathering. The Complaints Manager will also agree the best way to provide a response to the individual.

5.12 No employee of NISCC will be involved in investigating or determining a complaint in relation to their own acts, omissions or decisions.

5.13 In addition, if the complaint is in relation to the Complaints Manager it will automatically be dealt with by the Director of Registration and Corporate Services under Stage 2 (and the next referral stage will be considered by the NISCC Chief Executive, should that be necessary). See Stage 2 below for further information.

How to Make a Formal Complaint – Stage 2

- 5.14 Should the individual remain unsatisfied with the response they receive from the Complaints Manager under Stage 1 (above) they have a right of review by the Director of Registration and Corporate Services (the Director) who is also a member of NISCC's Senior Management Team. The Complaints Manager will inform an individual of their right for a review by the Director when replying to the complaint.
- 5.15 Should an individual wish to avail of their right for a review they should email or write to the Director of Registration and Corporate Services (see Contacts at the end).
- 5.16 The review will be acknowledged within 2 working days and again the Director will seek to reply to the individual within 20 working days, or sooner where possible. In addition, the Director of Registration and Corporate Services may decide that an alternative form of resolution is required depending on the nature of the complaint e.g. mediation, face to face meeting.
- 5.17 To ensure the independence of the review the Complaints Manager will not be involved in the stage 2 Complaints Procedure but will be required to supply the Director with copies of the original complaint, any additional material received or sought to inform the investigation and a copy of the final response to the complainant.
- 5.18 Should the complainant remain dissatisfied following the review by the Director they will be advised in the response that they may raise the complaint with the Northern Ireland Public Services Ombudsman (see contacts at end). There are three ways in which a person may raise a complaint with the Ombudsman – by completing an online complaint form, downloading and returning a complaint form, or by contacting their office by phone, email or in writing.
- 5.19 While every effort will be made to investigate and reply to formal complaints within 20 working days there may be times when additional time is needed. If this happens the complainant will be advised at the earliest possible opportunity and within the 20 days. The complainant will be advised of why additional time is required and how long it will take to provide a full response.
- 5.20 At any stage of an investigation of a complaint, it may become apparent that the Disciplinary Procedures should be invoked. If this is the case the Complaints Manager will refer the matter to the Director of Registration and Corporate Services in the first instance for those matters to be considered.

6. Support for Staff

- 6.1 All NISCC staff will be trained in managing complaints and managing difficult conversations. New staff will also receive this training as part of their induction. In addition, NISCC staff who are the subject of complaints may experience anxiety and stress. NISCC will ensure that such staff are supported and that they have access to

support (e.g. Trade Union, Carecall, etc.) and if necessary, to appropriate counselling.

7. Exceptions

Legal Correspondence

7.1 In accordance with the directions issued by the Department of Health a complaint about which the complainant has stated that they intend to take legal proceedings will not be considered under this Policy.

Anonymous Complaints

7.2 NISCC does not accept anonymous complaints for investigation. Such complaints can be difficult to investigate and appropriately respond to. However where an anonymous complaint is received and it identifies systemic issues of concern it will be referred to the Director of Registration and Corporate Services in the first instance to determine whether the matters raised can be investigated.

Unreasonable, Vexatious or Abusive Complaints

7.3 While NISCC aims to provide a service which is accessible to all complainants, and to treat those complainants fairly, honestly, consistently and appropriately, it has arrangements in place to deal with complaints which it considers to be unreasonable or vexatious, or in the instance of a complainant becoming abusive or aggressive. Staff are advised under NISCC's Zero Tolerance Policy and the Guidance on Verbal Abuse that they should be able to undertake their duties without fear of abuse and may terminate calls politely after giving due warning and may report calls that are abusive to their line manager. This Complaints Policy also includes a copy of NISCC's Unacceptable Actions Policy.

8. Potential Outcomes

8.1 Due to the varied nature of complaints the potential outcomes can vary considerably, however in general outcomes of upheld complaints can result in –

- An apology;
- An explanation;
- Correcting the error;
- Undertaking service improvement;
- Training for staff;
- A change in policy or procedure.

8.2 This is not a definitive list and a complainant is encouraged to explain the potential outcome they seek when making the complaint.

9. Policy Monitoring and Reporting

9.1 It is essential that NISCC monitors the outcome of complaints (both formal and informal) to ensure that complaints are treated seriously and agreed action is delivered in a timely manner. Monitoring complaints in this way can also identify trends, common issues, whether the Policy is accessible and working as defined in this Policy, and to ensure effective reporting to senior management and Council.

9.2 To support this NISCC –

- Reviews its Complaints Policy every two years (or sooner if required);
- Reports on complaints and outcomes to NISCC's Senior Management Team (SMT) on a monthly basis;
- Reports on complaints and outcomes to NISCC Council on a quarterly basis;
- Engages Internal Audit to review its complaints handling;
- Reports to the SMT and Council on any appeals to the NI Public Service Ombudsman;
- Reports on its complaints management in its Annual Report and Accounts;
- Elevates risks where relevant to its risk register.

10. Equality Screening

10.1 This policy has been screened for equality implications as required by Section 75 and Schedule 9 of the Northern Ireland Act 1998. Equality Commission guidance states that the purpose of screening is to identify those policies which are likely to have a significant impact on equality of opportunity so that greatest resources can be devoted to these.

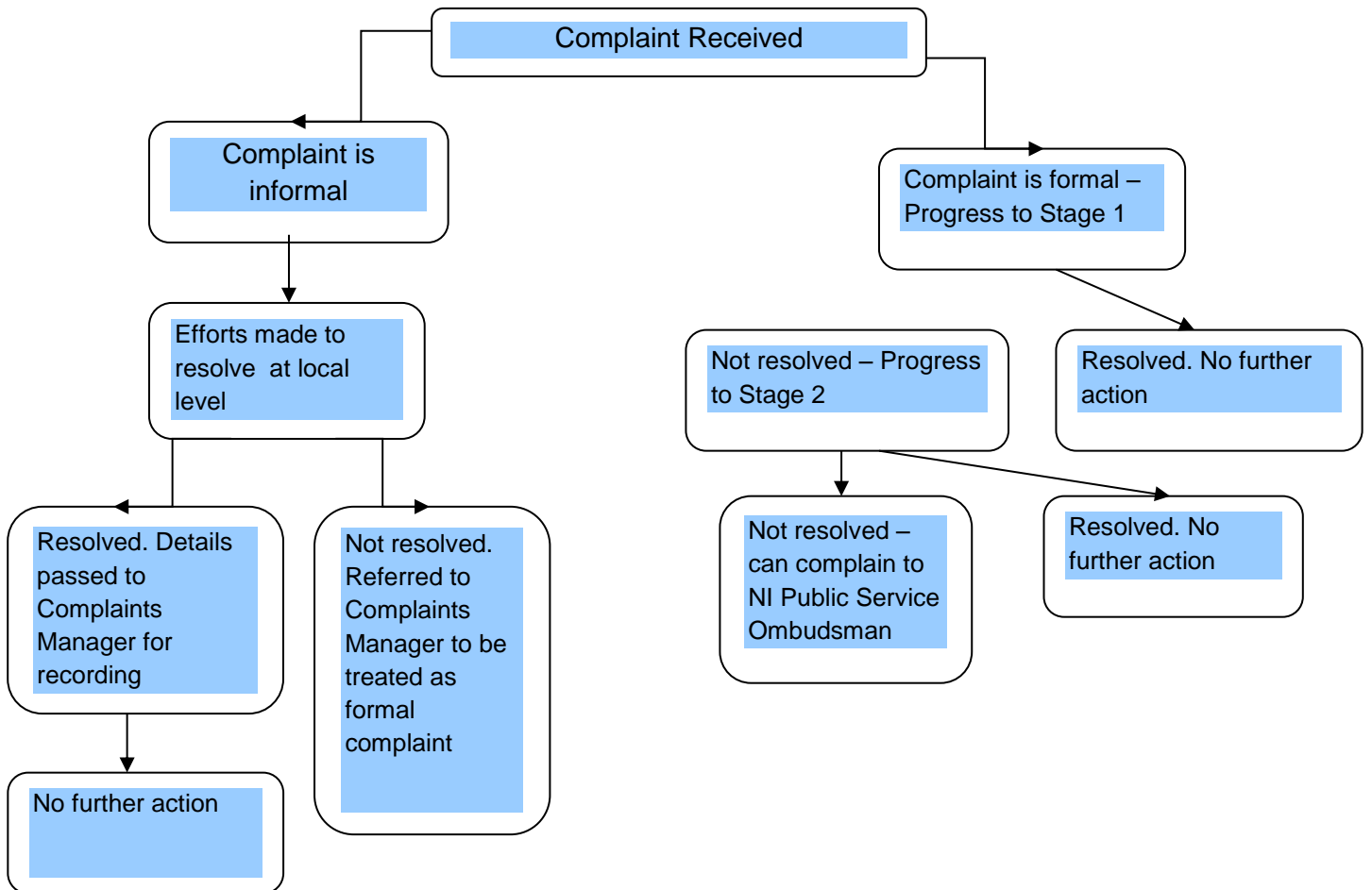
10.2 Using the Equality Commission's screening criteria, no significant equality implications have been identified. Similarly, the policy has been considered under the terms of the Human Rights Act 1998, and was deemed compatible with the European Convention Rights contained in the Act.

11. Endorsement and Review

11.1 This Policy was endorsed by NISCC's Senior Management Team in January 2017 and by Council in February 2017. It is due for review by February 2019.

February 2017

NISCC COMPLAINTS POLICY OVERVIEW



NISCC COMPLAINTS POLICY

USEFUL CONTACTS

- **Sandra Stranaghan, Complaints Manager**
NI Social Care Council,
7th Floor, Millennium House
19-25 Great Victoria Street
Belfast, BT2 7AQ
Tel. 028 9536 2600 email – Sandra.stranaghan@niscc.hscni.net
- **Mark Bradley, Director of Registration and Corporate Services**
NI Social Care Council,
7th Floor, Millennium House
19-25 Great Victoria Street
Belfast, BT2 7AQ
Tel. 028 9536 2600 email – mark.bradley@niscc.hscni.net
- **Northern Ireland Public Services Ombudsman**
Progressive House
33 Wellington Place
Belfast, BT1 6HN
Tel. 028 9023 3821 email – nipso@nipso.org.uk
Website – www.nipso.org.uk
- **Northern Ireland Social Care Council**
7th Floor, Millennium House
19-25 Great Victoria Street
Belfast, BT2 7AQ
Tel. 028 9536 2600 email – info@niscc.hscni.net
Website – www.niscc.info

NISCC Unacceptable Actions Policy

1 Introduction

- 1.1 NISCC is committed to executing its responsibilities to the highest standards possible and wishes to hear about and address any concerns or complaints regarding the way in which it has carried out, or failed to carry out, any of its functions.
- 1.2 NISCC values complaints and views them as a significant source of learning, enabling the organisation to continually improve the quality of its services.
- 1.3 However, on extremely rare occasions, NISCC may receive a complaint which it considers to be unreasonable or vexatious, or may deal with a complainant whose actions or behaviour it deems to be unacceptable. This policy sets out the approach which NISCC will follow on these occasions.
- 1.4 This policy is based on Department of Health guidance: Complaints in Health and Social Care – Standards and Guidelines for Resolution and Learning (April 2009).
- 1.5 The term complainant includes anyone acting on behalf of a complainant or anyone who contacts NISCC in connection with a complaint.
- 1.6 This policy should be read in conjunction with NISCC's Complaints Policy.

2 Policy Aim

The key aims of this policy are:

- 2.1 To make it clear to all complainants, both at initial contact and throughout their dealings with the organisation, what NISCC can or cannot do in relation to their complaint. In doing so, NISCC aims to be open and not raise hopes or expectations that cannot be met.
- 2.2 To deal fairly, honestly, consistently and appropriately with all complainants, including those whose actions are considered unacceptable. All complainants have the right to be heard, understood and respected. NISCC staff have the same rights.
- 2.3 To provide a service that is accessible to all complainants. However, NISCC retains the right, where it considers a complainant's actions to be unacceptable, to restrict or change access to the service.
- 2.4 To ensure that other complainants and NISCC staff do not suffer any disadvantage from complainants who act in an unacceptable manner.

3 Defining Unacceptable Actions

- 3.1 People may act out of character in times of distress. There may have been upsetting or distressing circumstances leading up to a complaint which can affect their behaviour.
- 3.2 NISCC does not view behaviour as unacceptable just because a complainant is assertive or determined. In fact, NISCC recognises that being persistent can be a positive advantage when pursuing a complaint.

- 3.3 However, the actions of a complainant who is angry, demanding or persistent may result in unreasonable demands on the NISCC or unacceptable behaviour towards NISCC staff.
- 3.4 It is these actions which NISCC considers unacceptable and aims to manage under this policy.
- 3.5 NISCC has categorised these actions under the following headings.

Aggressive or Abusive Behaviour

- 3.6 NISCC expects its staff to be treated courteously and with respect. Violence of any kind and physical or verbal abuse is unacceptable and a zero tolerance approach will be adopted.
- 3.7 Aggressive or abusive behaviour is considered to be behaviour or language (whether verbal or written) that causes a staff member to feel afraid, threatened or abused – examples of this include threats, physical violence, personal verbal abuse, derogatory remarks and rudeness.
- 3.8 NISCC also considers that inflammatory statements and unsubstantiated allegations can be abusive behaviour.
- 3.9 The anger felt by many complainants involves the subject matter of their complaint. It is not acceptable, however, when anger escalates into aggression toward NISCC staff. Staff will undergo specific training to understand the difference between anger and aggression.

Unreasonable Demands

- 3.10 Complainants may make what NISCC considers to be unreasonable demands through the amount of information they seek, the nature and scale of service they expect or the number of approaches they make. What amounts to unreasonable demands will always depend on the individual circumstances surrounding the behaviour and the seriousness of the issues raised by the complainant.
- 3.11 Examples of this would include:
- demanding responses within an unreasonable timescale;
 - insisting on seeing or speaking to a particular member of staff;
 - continual telephone calls, letters or emails;
 - repeatedly changing the substance of the complaint;
 - raising unrelated concerns

This list is not exhaustive.

- 3.12 NISCC considers these demands as unacceptable and unreasonable if they start to impact substantially on the work of the organisation, such as taking up an excessive amount of staff time to the disadvantage of other complainants or functions.

Unreasonable Persistence

- 3.13 It is sometimes the case that some complainants will not or cannot accept that NISCC is unable to assist them further or provide a level of service other than that provided already. Complainants may persist in disagreeing with the action or decision taken in relation to their complaint or contact NISCC persistently about the same issue.
- 3.14 Examples of this would include:
- Persistent refusal to accept a decision made in relation to a complaint;
 - Persistent refusal to accept explanations relating to what NISCC can do or cannot do;
 - Continuing to pursue a complaint without presenting any new information.
- The ways in which these complainants approach NISCC may be entirely reasonable, but it is their persistent behaviour in continuing to do so that is not.
- 3.15 NISCC would consider the actions of persistent complainants to be unacceptable when they take up what NISCC regards as being a disproportionate amount of time and resources.

4 Managing Unacceptable Actions

- 4.1 There are relatively few complainants whose actions NISCC consider unacceptable. How we manage these depends on their nature and extent. If it adversely affects NISCC's ability to do its work and provide a service to others, NISCC may need to restrict complainant contact in order to manage the unacceptable action.
- 4.2 NISCC will do this in a way, wherever possible, that allows a complaint to progress to completion through the complaints process.
- 4.3 NISCC may restrict contact in person, by telephone, fax, letter or electronically or by any combination of these. NISCC will try, however, to maintain at least one form of contact.
- 4.4 In extreme circumstances, NISCC will inform the complainant in writing that their name is on a 'no contact' list. This means that we may restrict contact to either written communication or through a third party.
- 4.5 The threat or use of physical violence, verbal abuse or harassment towards NISCC staff is likely to result in the ending of all direct contact with the complainant. All incidents of verbal and physical abuse will be reported to the police.
- 4.6 NISCC does not deal with correspondence (letter, fax or electronic) that is abusive to staff or contains allegations that lack substantive evidence. When this happens, the NISCC will tell the complainant that it considers their language to be offensive, unnecessary and unhelpful. NISCC will ask the complainant to stop using such language and state that it will not respond to their correspondence if it continues. NISCC may require further contact through a third party.
- 4.7 NISCC will end telephone calls if the caller is considered aggressive, abusive or offensive. The staff member taking the call has the right to make this decision, tell

the caller that their behaviour is unacceptable and end the call if the behaviour continues.

- 4.8 Where a complainant repeatedly phones, visits NISCC, sends irrelevant documents or raises the same issues, NISCC may decide to, for example:
- only take telephone calls from the complainant at set times on set days;
 - put an arrangement in place for only one member of staff to deal with calls or correspondence from the complainant in future;
 - require the complainant to make an appointment to see a named member of staff before visiting NISCC;
 - require the complainant to contact NISCC in writing only;
 - return the documents to the complainant or, in extreme cases, advise the complainant that further irrelevant documents will be destroyed;
 - take other action that NISCC considers to be appropriate.

NISCC will inform the complainant of the action it is taking and why.

- 4.9 Where a complainant continues to correspond on a wide range of issues and the action is considered excessive, the complainant will be informed that only a certain number of issues will be considered in a given period and asked to limit or focus their requests accordingly.
- 4.10 Complainant action may be considered unreasonably persistent if all internal review mechanisms have been exhausted and the complainant continues to dispute NISCC's decision relating to their complaint.
- 4.11 In this instance, the complainant will be told that no future phone calls will be accepted or interviews granted concerning this complaint. Any future contact by the complainant on this issue must be in writing. Future correspondence will be read and filed, but only acknowledged or responded to if the complainant provides significant new information relating to the complaint.

5 Deciding to Restrict Complainant Contact

- 5.1 NISCC staff who directly experience aggressive or abusive behaviour from a complainant have the authority to deal immediately with that behaviour in a manner they consider appropriate to the situation in line with this policy.
- 5.2 With the exception of such immediate decisions taken at the time of an incident, decisions to restrict contact with NISCC will only be taken after careful consideration of the situation by a member of SMT.
- 5.3 Wherever possible, the NISCC will give the complainant the opportunity to modify their behaviour or action before a decision is taken.
- 5.4 Complainants will be told in writing why a decision has been made to restrict future contact, the restricted contacts arrangements and, if relevant, the length of time that these restrictions will be in place.

6 Appealing a Decision to Restrict Contact

- 6.1 A complainant can appeal a decision to restrict contact. A member of SMT who was not involved in the original decision will consider the appeal. The complainant will be advised in writing that either the restricted contact arrangements still apply or a different course of action that has been agreed. There is no further internal appeal. An individual retains the right, having explored this mechanism, to raise the issue with the Northern Ireland Public Services Ombudsman.

7 Recording and Reviewing a Decision to Restrict Contact

- 7.1 NISCC will record all incidents of unacceptable actions by complainants. Where it is decided to restrict complainant contact, an entry noting this is made in the relevant file and on appropriate computer records in accordance with the Data Protection Act.
- 7.2 A decision to restrict complainant contact may be reconsidered if the complainant demonstrates a more acceptable approach.
- 7.3 A senior member of staff will review the status of all complainants with restricted contact arrangements on a regular basis.
- 7.4 An annual report of this activity will be submitted to SMT and the Council alongside the annual report for complaints.