

REPORT TO: Children Young People and Families Policy and Performance Board

DATE: 2nd September 2015

REPORTING OFFICER: Strategic Director, Children & Economy

PORTFOLIO: Children, Young People and Families

SUBJECT: Annual Report - Comments, Complaints and Compliments relating to Child Social Care Services
1st April 2014 - 31st March 2015.

WARDS: All

1. PURPOSE OF REPORT

- 1.1 To meet the statutory requirement to publish an Annual Report.
- 1.2 To report and provide an analysis on complaints processed under the Children Act 1989, Representation's Procedure.

2. RECOMMENDATION: That

- 2.1 **The report is accepted as the mechanism by which the Local Authority is kept informed about the operation of its complaints procedure for Children Social Care.**
- 2.2 **The Annual Report will evidence how feedback from service users has been used to improve service delivery.**

3. SUPPORTING INFORMATION

- 3.1 The aim of The Children Act 1989 Representations Procedure is for Children and Young People to have their concerns resolved swiftly and wherever possible by the people who provide the service locally.
- 3.2 A complaint may generally be defined as an expression of dissatisfaction or disquiet in relation to an individual child or young person, which requires a response.
- 3.3 There are 4 categories to the representation process.
 - i. Statutory Complaints - the complainant is eligible as stated in the Representations Procedure to make a formal complaint.
 - ii. Representations - where a complainant is not eligible under the Statutory Complaints Procedure to make a formal complaint, but their comments are noted and responded to. If it is not a complaint under the Statutory Procedure then the Corporate Complaints procedure may apply. These will often be as complex and take as much time as a statutory complaint and are recorded as Customer Care issues.
 - iii. Customer Care issues – can also include advice and guidance, signposting, problem solving and early resolution to prevent complaint escalation.
 - iv. Compliments – positive feedback
- 3.4 The formal complaints procedure has a process of 4 stages.

Stage 1: Aims to resolve the problem as quickly as possible (within 10 working days,

or 20 if complex)

Stage 2: If unhappy with response at stage 1, a request can be made for the complaint to be investigated by an Independent Investigator/Person (within 25 working days, 65 if complex).

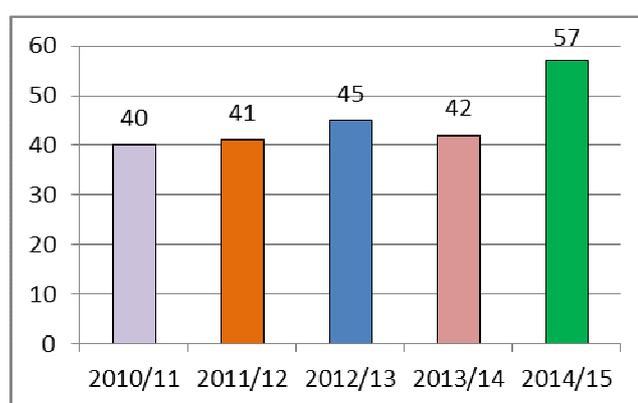
Stage 3: If still dissatisfied, a request can be made for a Review Panel to consider whether the complaint has been dealt with adequately. The Review Panel is made up of 3 independent people and should be held within 30 working days of request.

Stage 4: If still dissatisfied, the complainant has the right to refer self to the Local Government Ombudsman; they can do this at any stage of the complaint.

3.5 The Customer Care Manager has responsibility for the overall administration of Children Social Care complaints liaising with relevant services across the Children and Economy Directorate, parents and families in working to resolve children's social care complaints.

4.0 Annual Report 1st April 2014 – 31st March 2015 – Numbers of Complaints

a. 57 Statutory Complaints were made to the Council in 2014/15; this is a 36% increase from the previous year. Regionally colleagues report increased numbers and, the complexity of complaints as being more challenging.



b. From 1st April 2014, the Customer Care Manager moved from the Adult and Communities Directorate into the Children and Economy Directorate enabling the complete focus to be on Children Social Care complaints, this may also be attributed to the increased numbers. The process is promoted both to and by individual workers and teams and by the availability of information on the Councils webpage, this and the public information which informs on how to make a complaint was updated this year.

c. During an Ofsted inspection staff resources are diverted and following this there is a higher degree of staff absenteeism due to accrued flexi, annual leave and sickness. The Ofsted inspection took place in November and December and was followed by the Christmas office closure. This was certainly a challenging period and the increased numbers of complaints in Quarter 4 may demonstrate the impact on the service.

d.

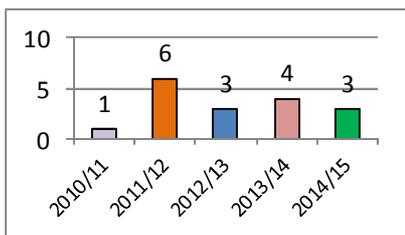
	Q1	Q2	Q3	Q4	Total
2014-15	14	11	13	19	57
2013-14	6	12	8	16	42
2012-13	12	9	12	12	45
2011-12	12	12	10	7	41
2010-11	10	7	11	12	40

The increased numbers identify that it continues to be accessible to those using services and that they feel able to express their views, which is positive.

4.1 Complaints were made by:

- a.
 - No complaints have been received from care leavers in the last 2 years.
 - 3 (5.3%) Young People made a complaint, 1 less than last year where the percentage was 9.5%. All the young people used an advocacy service, NYAS (National Youth Advocacy Service), who provide mediation and advocacy service

for children and young people in Halton. Children and young people are informed on how to make a complaint when they first become 'looked after' and receive a child friendly leaflet which explains clearly what to do if they are unhappy.



By year, the number of young people who have made a complaint.

- 1 complaint used an advocacy service, the Halton Autistic Family Support (HAFS)
- The remainder were made by parents or relatives.

- b. A focus report published in March 2015 by the Local Government Ombudsman Office "Are we getting the best from Children Social Care Complaints?" suggests this is the picture nationally where only a small proportion of complaints are from young people or those acting on their behalf. The majority are from parents, family or friends. This means that children's interests are sometimes not central to the complaint – they can be unaware of one being made – and the process can be used to further personal interests, like settling family disputes.

4.2 How complaints were made

	2014-15		2013-14		2012-13	
a. Complaint Form	12	21%	11	26%	14	31%
E-mail	14	25%	6	14%	4	13%
Letter	10	17%	7	17%	11	27%
Telephone	21	37%	18	43%	12	27%
Meeting	0	0%	0	0%	0	2%

- b. It is felt that complainants prefer to correspond in writing, either by letter, complaint form or email. The number of complainants using email has risen this year both in making a complaint and with general correspondence regarding it. This form of written communication has its benefits and may be another reason why complaints have increased. Sending emails on mobile phones is instantly gratifying if out of normal working hours and it can reduce their anxiety by not having to speak to someone. It does however increase the work involved as clients can scrutinise and challenge every detail of a response making the complaint more complex and generating further correspondence often of length. The clarification of detail and verbal communication remains essential.

4.3 Types of Statutory complaints made

a. Main categories	2014-15	2013/14	2012/13	2011/12	2010/11
Staff	7 (12%)	3 (7%)	1 (2%)	3 (7%)	17
Service (i.e. quality, lack of, over provision and client expectations)	27 (48%)	22 (52%)	30 (67%)	25 (61%)	19
Assessment / Review Process	23 (40%)	17 (41%)	14 (31%)	13 (32%)	3
Other	0	0	0	0	1
Total	57	42	45	41	40

- b. We categorise complaints at closure instead of upon receipt as the complainant will often state they wish to complain about the 'Social Worker'. Complaint investigations often conclude that staff were undertaking their statutory duties or acting within the

required policies and procedures and this is often the root cause of their complaint. Identified themes from complaints received in the year include:

- * Communication issues accounted for the majority of complaints around quality of service. This includes late or missed social work visits, non-return of phone calls or unanswered letters.
 - * Families of children who have been assessed as either a Child in Need or have been placed on a Child Protection Plan often dispute the reasons for the Council's intervention. As a result of this, relationships between the social worker and family members can often be strained. It is also very difficult for workers to liaise effectively with all significant family members, especially when information given may be misunderstood. This information may then be shared with other family members who may have interpreted the information differently. This may mean that any resulting disputes are then reflected back on the worker concerned.
 - * A number of complaints were around the quality of the support provided by Social Workers. Relatives of children receiving a service may sometimes misunderstand their relationship with the worker and can feel that the social work involvement is provided to the parent on behalf of the child or young person. It is important in these situations to make it clear that it the worker is acting on behalf of the child or young person themselves. However, despite this, Social Workers always try to ensure that family views and wishes are taken into account before any decisions are made.
 - * Another area of dissatisfaction is the initiation of Child in Need enquiries by Social Workers as the reasons for this involvement is often strongly disputed by parents and extended family members. As a result of this, complaints are raised regarding the quality or the detail of assessments as well as the timeliness of receiving them. These types of complaints are very difficult to resolve as they are regarding professional social work opinion during the assessment which often conflicts with how the complainant sees the situation at the time, adding the issue of delays reinforces their perception of injustice.
 - * There were a number of complaints in respect of families having a number of Social Workers. It is recognised that consistency is essential however staff do leave to pursue their careers and so in order to ensure services are provided whilst posts are recruited, agency staff were temporarily appointed. This made complaint handling difficult as once a Social Worker left complaints were raised by families and so the reliance was on the recorded data as this evidence supports complaint findings, in some instances this evidence was lacking.
- c. In terms of outcomes, every complainant received a full explanation about the alleged action or inaction in both a policy and procedural context. Where complaints were fully or partially upheld, the complainant received a full written apology.

4.4 The outcome of closed Stage 1 complaints

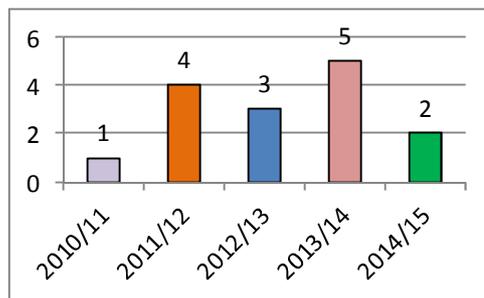
a.

Stage 1	Upheld	Partially upheld		Not upheld	Totals
2014-15	9	19	52%	26	54
2013-14	16	7	62%	14	37
2012-13	4	12	36%	29	45
2011-12	8	7	39%	23	38
2010-11	6	4	13%	25	35

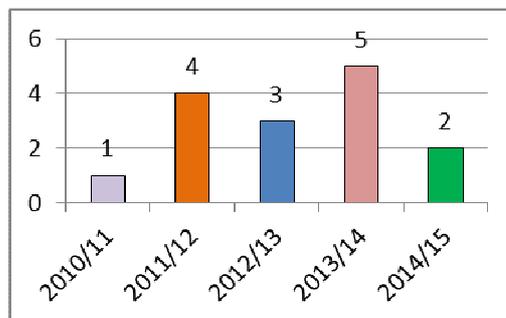
- b. A decision about whether a complaint is fully or partly upheld is based on the circumstances of the case, a decision to partly uphold a complaint normally results from a multi-strand complaint where we have upheld some but not all. This rise can evidence the increased complexity of complaints, letters detailing comprehensive complaints are also more difficult and time consuming to investigate and respond to.
- c. Overall, numbers of complaints received is small in comparison to the number of contacts Children's Services staff have with families, however the number of contacts have increased which may also be a factor in increased complaints. Caution does need to be exercised in using complaints data to draw conclusions about overriding themes, the complaints upheld were single incidents.

4.5 Stage 2 Complaints

- a. The aim is to resolve complaints as early as possible; where this is not achievable a formal complaint investigation under stage 2 of the complaints procedure is undertaken by an Independent person who will determine if all that could be done has been done and whether it is in line with policy, procedures or statutory requirements.
- b. Two Stage 2 complaint investigations were commissioned in this financial year, there were five in the previous year and so although the overall number of complaints has increased; those progressing to Stage 2 have decreased. Ensuring a thorough investigation and response at Stage 1 prevents complaints escalating to Stage 2.



- c. A Stage 2 that commenced was from a young person who wanted to move residential home and was supported by NYAS (National Youth Advocacy Service). The complaints process has an emphasis on resolving problems quickly and effectively, an effective complaints procedure will ensure that the child's voice is heard and when they are facing problems and challenges they should be well supported to overcome them, this complaint was withdrawn very early in the process.
- d. The other Stage 2 was in relation to a child who was assessed by the Occupational Therapy Service and it was a dispute over the offered service provision. A child with a disability is a Child in Need and so complaints of this nature also fall under 'The Children Act 1989 Representations Procedure (England) Regulations 2006'. This complaint was upheld and resulted in a reassessment to determine the level of service provision.



4.6 Stage 3 Review Panel

There has been no stage 3 Review Panels this year. Since 2009/10 there has only been one Stage 3 Review Panel which was held in June 2013, this continued to Stage 4 and was investigated by the Local Government Ombudsman.

4.7 Local Government Ombudsman (LGO)

From 1 April 2013 the LGO changed the process to consider complaints. This is now a three-stage process; Intake, Assessment and Investigation.

- a. The Ombudsman has only just concluded the investigation mentioned above (4.6), this is one that has been ongoing for a number of years and was also linked to a complaint being investigated by the Health and Parliamentary Ombudsman in relation to CAMHS (Child and Adolescent Mental Health Services). Fault was identified with both the Council and the 5 Boroughs Partnership NHS Foundation Trust (the Trust), in respect of the council they found fault in:
 - b.
 - the completion of a CAF
 - the loss of some respite provision
 - responding to referrals from CAMHS in March 2011, January and February 2012
 - the absence of its Children's Services daily records from 2010 to part of 2012
 - the delays in the Core Assessment process
 - a failure to have a joint working protocol with the Trust for young people with extreme and challenging behaviour
 - some of the Council's communication with the Trust
 - failure to establish a lead body and respond to the complaint jointly with the Trust
 - c. The LGO found that the injustice caused as a result of these identified faults was that of general distress and did not warrant the significant sums being sought, the LGO made a recommendation for a financial remedy. The Council had following the Stage 3 in 2013 agreed to apologise and offered £1,000 for the time and trouble spent pursuing their complaint, the offer was not to remedy any failings in the processes it had followed. The LGO in addition to this recommended an additional £150 to acknowledge the 15 hours of respite lost in 2010 and £750 to acknowledge the distress, anxiety and frustration caused to the family. The Council has accepted this recommendation.
 - d. There are also recommendations in respect of adhering to process and procedure, this is a complaint in relation to events that occurred in 2010 and 2012 and inevitably things have since moved on in terms of practice, processes and working relationships. The LGO stipulates that all service improvements should be started within three months of the final decision, and that they are updated on progress monthly thereafter until they are completed and so evidence of this will need to be provided.
 - e. Another enquiry was received by the LGO as the Council declined a request to

progress a complaint to Stage 2 of the process. The LGO found there to be no injustice to warrant an investigation by them. A further complaint is currently with the LGO as it was felt that by progressing it to Stage 3 would not change the outcome and this would ultimately prolong the process for a vulnerable client.

4.8 Timescales

- a. We aim to provide responses to complaints within 10 working days. It can be extended to 20 working days where, for example, a case may be particularly complex or there are other mitigating circumstances (eg key staff member is absent).

- b. The Ofsted Inspection commenced on Tuesday 18th November, the below table gives a measure of the improved performance between 1st April 2014 to 18th November 2014.

	% within 10 days	% within 20 days	% over 20 days
01.04.2014 to 18.11.2014	45%	90%	10%
2013-14	43%	79%	21%

- c. The below table demonstrates the impact the Ofsted Inspection had on complainants receiving responses to their complaints due to the diversion of resources during the inspection and staff absence following it.

	% within 10 days	% within 20 days	% over 20 days
2014-15	35%	75%	25%
2013-14	43%	79%	21%
2012-13	71%	96%	4%

- d. The number of complaints has risen at a time when there are increased time pressures on Children's Services Managers. Whilst operational pressures of child protection take priority, the complaint timescales are a statutory requirement and this has not been met in 25% of the Stage 1 complaint responses. When complaints are received regarding communication and timeliness then further delays in the complaint responses can reinforce the complainant's perceptions and undermine the work to resolve their complaint.

- e. To increase timeliness of responses and in line with the reconfiguration of the Principal Manager and Practice Lead roles, the Practice Leads are now also undertaking Stage 1 complaint investigations and responses. The pool of staff to respond to complaints has gone from four to twelve and with this comes different challenges for the Customer Care Manager. Practice leads are new to this and so require additional support, the more staff involved can bring variance in styles of responses and so there needs to be quality assurance to ensure compliance with timescales and consistency in responses.

- f. Of the completed Stage 2 investigations all were completed within statutory 65 working days timescale.

4.9 Other Customer Care Contacts

- a. "Customer Care Contacts" are those that do not fall within the statutory complaints procedure, but where time is spent communicating with clients to resolve issues, this can include sign-posting to other services, mediating between parties or liaising with Corporate Complaints Team.

- b. Of these Customer Care Contacts: Three Representations were made to the Local

Authority, with all having progressed to Stage 2 of the Corporate Complaint Procedure for independent review. Although 9 less than the previous year this is the first time they have progressed this way with each one being complex and time consuming as a statutory complaint. Due to the complexity one was investigated by an external independent officer, there were 3 elements investigated, none were upheld.

- c. There has been a further increase in the recorded customer care contacts in relation to Children Social Care. These are contacts, which are resolved at point of contact (e.g. liaising with Social Workers, provision of information, signposting). These contacts provide an early resolution, and can prevent a formal complaint.

2014-15	71
2013-14	48
2012-13	25

- d. 24 MP enquiry responses have been facilitated slightly more than the previous year but consistent. Councillors and MP's write to the Director of Children's Services on behalf of their constituents. The Customer Care Manager helps co-ordinate responses to these enquiries.

2014-15	24
2013-14	21
2012-13	27

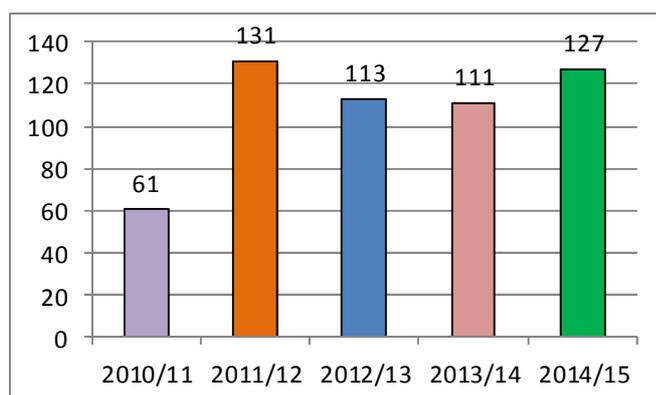
- e. Whilst customer satisfaction surveys are sent to complainants, none were returned in the last year.

4.10 Complaints Handling Training

There were a number of new Managers within Children's Social Services, complaint training was provided to those Principal Manager and Practice Leads but also offered to long standing staff to refresh their investigation skills. This was a joint venture with Cheshire West and Chester with both Local Authorities organising and funding a course provided by the Local Government Ombudsman Office. This facilitated the course being fully attended, the service being adequately covered and the sharing of experience and good practice. The Customer Care Manager provided briefings on the complaint process via team meetings for Social Workers.

4.11 Compliments received in the Children & Economy Directorate.

- a. Numbers have increased. There were 127 compliments this year; a separate compliments report has been compiled. Staff are reminded to forward compliments or positive feedback to the Customer Care Manager but it is embedded into working practice and so more often than not, they are submitted without any reminders.



b. **Children and Families Compliments (Children’s Social Care only)**

Year	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
2014/15	23	25	22	15	85
2013/14	16	14	19	15	64
2012/13	11	17	18	26	72
2011/12	27	25	32	9	93

c. A separate compliments report has been compiled, but illustrative comments about Children Social Care include:

1) *Things are great, actually never been better. Without your involvement we would never have got this settled, everybody knows their boundaries, we have a good routine in place and people have noticed the change in us. (Service user)*

2) *Text- the children often talk about you fondly, you are especially in my thoughts at the moment, we have got our first special little people staying with us, we're delighted to have them, they are settling in well and getting us trained!!! It seems unbelievable that about a year ago we first spoke to you at that meeting, thanks for all your support, understanding and for just being you, here we are in the fostering world! Thank you for being such a lovely assessor and lovely person. (Service user)*

3) *Child- Letter- he is the best Social Worker ever, he has helped my mum, he supports us on whatever we do, he has a good relationship with us, we can always tell him how we are feeling.(Service user)*

4) *Young person - happy that there's no more drama, CAF has helped me in lessons and to get along with people better.(Service user)*

5) *Email- you hear too much about people talking bad about social workers well I've had a completely different experience. She has been absolutely wonderful, kept us informed, explained everything and always been there when I've needed her. My children really like her, her manner is brilliant, to conclude she is brilliant at her job and a really lovely lady, thanks. (Service user)*

6) *I can only thank you for the wonderful journey with us and for the wonderful approach dealing with family issues. Your guidance has made us a more functional family, stronger as a result and the expert advice and support has been amazing. (Service user)*

7) *Card- Thank you so much for your help with my file, it's great to now have a gap filled and to understand. I couldn't have asked for any better response, it felt like nothing was too much trouble. I felt like Halton knew exactly what I was thinking and provided any support I needed. Many thanks (Service user)*

8) *Care leaver - Thank you for being there, I really appreciate it, I feel I have connected with you and you actually understand me and don't judge, that means a lot so thank you very much. (Service user)*

9) *Care leaver - Thank you so much for your support over the last few years. Without your support I would not be where I am now and as strong as I am now, I will never be able to thank you enough. Everything I have ever asked you to do you have done straight away and never let me down. You deserve an award, I really do*

*appreciate it and one day I hope I have the same effect on people the way you do.
(Service user)*

10) Newspaper article- A care package funded by Halton Council has now given the family support and a fresh start. This gives us time to be us again and spend time with our eldest child. This care has made a massive difference. I'm more positive about the future now because we don't feel we are on our own. (Service user)

4.12 Learning and service improvement

- a. Some complaints highlight issues that may impact on others in a similar situation. Learning from such issues help to inform the improvement or development of services. Managers responding to complaints identify any learning from a complaint in an action plan and monitor progress and actions required.
- b. Individual issues identified through complaints are followed up by managers in staff supervision to inform individual learning and also where appropriate within team meetings. More widely, learning from complaints is used to inform generic training and service development through the Operational Leadership Team.
- c. The majority of complaints received in 2013/14 were around low-level issues that did not require any significant changes to service. Improvements this year influenced by learning from complaints include:
 - * Workers were reminded of the importance in maintaining good working relationships with family members or significant others who are involved in children or young people's lives. It is acknowledged that relationships are often strained, given the situation, but workers should be mindful of how their manner may impact on others and how their behaviour or language may be mistakenly interpreted as well as the phrasing used in documentation.
 - * Staff have been reminded of the timeliness in providing assessments and minutes to families and the recording of information on electronic systems.
 - * Training for staff in respect of complaint handling and information handling (Data Protection).
 - * As a result of complaint received from a young person in care it was identified that the standards around basic pocket money had been interpreted differently, this matter was investigated and staff liaised with the Children's Rights Office. The standards were reviewed and young people were consulted, this resulted in a review of their pocket money and behaviour management plans.
 - * An adjudication report is produced for all Stage 2 complaints, which identifies the required remedies for the complainant, learning outcomes and service improvements for the Authority. Where there are elements of the complaints that are upheld the required remedies were adhered to but there were no key policy recommendations.
 - * We receive notifications from the Local Government Ombudsman of cases they have investigated elsewhere in the country; they provide an opportunity to reflect on the consequences of processes not being applied, learn from them and develop our own practice. These reports are shared with the Senior Management Team to cascade to appropriate staff.
 - * Compliments are also a measure of awareness from our Service Users; it is their

acknowledgment of the good developments and the positive effects on them. Staff benefit from receiving compliments, knowing that they are noticed and that they are valued is powerful in motivating continued efforts. People strive to do more of what brings praise from others.

5 Action Plan 2014-15

- a. The following actions were identified as areas of work for 2014-15
 - Explore ways of communicating and publicising the complaints and representations procedure to Young People, staff within Halton Council.
 - Raise the profile of the Customer Care Manager and complaints within the Directorate.
- b. After review, publicity was updated, the Customer Care Manager attended team meetings and moving in to the Directorate has allowed a visible presence. Links were made with the Participation and Inclusion Officer for Looked after Children who visits every child in care and has ensured each is aware of the complaints process and how to access it. Links remain good with NYAS and Independent Reviewing Officers. The Single Assessment Pack includes information on how to make a complaint.
- c. An area for future consideration is in relation to the recording of complaints at service level, commissioned services and feedback about services received via the intelligence unit.

6 POLICY IMPLICATIONS

- a. "Compliments, Comments and Compliments" is the guidance intended to detail the policy and procedure for each type of complaint and provide guidance on how to respond when they receive a complaint. This document remains under review and will be amended when changes in legislation or procedure occur.
- b. Where identified through the complaints process, policies can be amended to improve service delivery.
- c. Halton Council is a member of the North West Regional Complaints Managers Group. The aim of the regional groups, which meet bi-monthly, is to provide a forum in which peer professionals can discuss and learn about regional and national issues. Here there are opportunities to develop local practice standards, discuss performance and problem solve. The group also discuss proposed changes to legislation and procedures and prepare consultation responses where necessary.

7 OTHER/FINANCIAL IMPLICATIONS

Investing in a timely and thorough complaint investigation and a written response at Stage 1 identifies potential savings for the Local Authority as this can prevent the complaints progressing to Stage 2. Costs are incurred in commissioning Stage 2 complaint investigations and in releasing staff to participate in these.

8 IMPLICATIONS FOR THE COUNCIL'S PRIORITIES

8.1 Children & Young People in Halton

The learning taken from comments, complaints and compliments ensures the ongoing development of services to provide better outcomes for children, young people and their families. The transparency of the process enables children, young people and their families to challenge our provision of services if they feel unhappy about any aspect of it and provides independent oversight if required.

8.2 **Employment, Learning & Skills in Halton**

Any findings from a comment, complaint or compliment relating to this priority will be used to inform the relevant service.

8.3 **A Healthy Halton**

Any findings from a comment, complaint or compliment relating to this priority will be used to inform the relevant service.

8.4 **A Safer Halton**

Any findings from a comment, complaint or compliment relating to this priority will be used to inform the relevant service.

8.5 **Halton's Urban Renewal**

Any findings from a comment, complaint or compliment relating to this priority will be used to inform the relevant service.

9 **RISK ANALYSIS**

- a. Failure to implement an efficient service could result in the local authority being challenged for not dealing with complaints in a timely and efficient manner and could result in the customer not receiving a service which could then detrimental to their safety and wellbeing.
- b. Children Social Care Complaints are included within the Ofsted Inspections Handbook: Inspections of Services for Children in Need of Help and Protection, Children Looked After and Care Leavers. Failure to meet the standards as prescribed in the Children Act 1989 Representations Procedure and the Guidance "Getting the Best from Complaints" can potentially impact on the overall findings of the Inspection.
- c. Whilst complaints can result in changes for individuals, collectively they are a key source of information to help us develop the services we provide or commission.

10 **EQUALITY AND DIVERSITY ISSUES**

- a. No matter who complains they receive the same equality of access and provision.
- b. Children and young people under the age of 18 made 3 complaints. The ethnicities of these complainants were White British (source Carefirst) with 2 being female and 1 being a male.
- c. Of the adults over the age of 18 years, 15 were male and there was an increase in female complaints to 38 percentage increase from 58% to 72%. None declared a disability.
- d. Complaints from ethnic minorities remains low which reflects the demographics of the borough. (Information sourced from Carefirst or complaint form).
 - 1 was white and black Caribbean
 - 1 was other mixed background
 - 1 white Irish
 - 2 complainants did not state ethnicity
 - the remaining 52 were White British

11 **LIST OF BACKGROUND PAPERS UNDER SECTION 100D OF THE LOCAL GOVERNMENT ACT 1972**

Document	Place of Inspection	Contact Officer
Representation Procedure 1989	Rutland House	Dorothy Roberts Customer Care Manager