

# Complaints Policy

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## How to complain

Webform	<a href="#">Complaint, comment and suggestion form</a>
Email	<a href="mailto:mayor@london.gov.uk">mayor@london.gov.uk</a>
Letter	Public Liaison Unit - Complaints City Hall Kamal Chunchie Way London E16 1ZE
Phone	0207 983 4000

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Document owner	Senior Public Liaison Team Manager

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# A. Complaints Policy

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## 1. Policy statement

1.1 The GLA aims to engage with Londoners efficiently, effectively and fairly. But sometimes things go wrong. When they do, we are committed to providing a simple and effective route for members of the public to make a complaint; and then assessing each complaint carefully and treating those that are legitimate seriously and responding quickly (within 20 working days). Where we have made a mistake, we will apologise and, as far as possible, put things right. We also take the view that complaints are a valuable source of feedback that help us improve our ways of working and services.

1.2 This document reinforces the GLA's commitment to listening to, effectively responding to and learning from complaints; and it sets out the GLA's procedure for responding to complaints. It is for those who work for the GLA and members of the public.

## 2. Outcomes

2.1 The outcomes sought from the Complaints Policy are to ensure:

- members of the public with genuine concerns understand and feel able to complain – with the complaints process being both accessible and straightforward, with extra support for those who need it to help them complain.
- complainants are treated fairly and consistently – and receive a clear and comprehensive response, an apology where things went wrong and details of how the GLA will, where possible, put things right.
- the GLA learns from complaints to help continuously improve its customer service and service delivery – and maintains its integrity and good reputation.

## 3. Overview of the GLA's approach

3.1 The GLA aims to get things right first time; and where there are issues, to resolve these before they become a problem and a complaint is made. However, when and where we don't, we want the process for complaining to be transparent and simple; and for that process to be well-understood and consistently followed by staff. To this end, the GLA has a two-stage complaint process, which is described in part B.

3.2 The Public Liaison Unit (PLU) oversees the complaints process and tracks responses. PLU will determine whether to categorise correspondence as a complaint. Where a complaint has been received by a member of GLA staff outside of PLU, the member of GLA staff should proactively contact PLU, who will log the complaint on the GLA's correspondence management system.

3.3 The GLA will acknowledge the receipt of each complaint within five working days and tell the complainant that their correspondence is being treated as a complaint under this policy. We then aim to respond within 20 working days from the receipt of the complaint (providing either a stage 1 or stage 2 response, as applicable).

3.4 If a response to a complaint cannot be provided within 20 working days, the complainant will be notified as soon as this becomes apparent and given a revised timescale as to when they can expect a full response to their complaint.

## 4. Scope and definitions

4.1 This policy applies to complaints about employees of the GLA and individuals working on behalf of the GLA; for example, temporary agency staff, consultants and volunteers.

4.2 Anyone who receives or is affected by a GLA service or interaction can make a complaint – and this policy is the approach complainants should follow and sets out what they should expect from us. It does not apply to every type of complaint, and this is explained later in this section.

### *Definition*

4.3 A complaint is an expression of dissatisfaction by one or more members of the public (or other stakeholder) about the GLA's action or lack of action or about the standard of a service which the GLA has a role in providing.

4.4 The 'service' includes:

- GLA initiatives that interact with / impact on members of the public
- GLA services, including those that are delivered by a third-party (i.e. by a contractor) or in partnership (and the GLA is the accountable body)
- customer services and any interaction by the GLA with the public; including contact through letters, emails, social media and promotional material, phone calls, and visits to City Hall and other GLA premises

4.5 A complaint could, for example, be in relation to:

- the GLA providing incorrect or misleading information
- a failure by GLA staff in dealing with the affairs of the public sympathetically, efficiently, and without bias
- a failure by the GLA to implement one of its policies
- a delay by the GLA in reacting to a situation without good reason
- a failure to provide a service; or providing that service unfairly or not to the required standard
- any other discriminatory treatment by the GLA

4.6 A complainant does not have to expressly say they are writing to complain or that they wish their correspondence to be treated as a complaint. Nevertheless, it is helpful for the GLA if members of the public are able to flag that they wish their correspondence to be treated as a complaint; noting it is a decision for the GLA, with reference to this policy, whether it does or does not treat that correspondence as a complaint.

4.7 The GLA will not treat the following as complaints:

- dissatisfaction with the GLA's actions/approach where the GLA has been properly carrying out or implementing the law and/or Government policy (i.e. where the GLA did not have discretion to act in a different way)
- disagreement with GLA/Mayoral policy positions or media comment, where such positions/comments have been developed and properly approved through the correct channels and according to GLA procedures
- complaints about projects that are supported by GLA grant funding but delivered by a third party. See section 5 of this document for more information
- complaints from individuals who have exhausted the GLA's complaints process; for example, which have been escalated to the Local Government and Social Care Government Ombudsman or have already been decided by a court or independent tribunal
- instances where a complainant or the GLA has started legal proceedings (but not where a complainant has only threatened legal action)
- vexatious complaints, to which the GLA's Vexatious Behaviour Policy will be applied

4.8 Sometimes members of the public may simply want to provide feedback or make a suggestion rather than a complaint. The GLA will treat these as routine correspondence and will ensure the comments or suggestions are reviewed and acted upon as appropriate.

4.9 Similarly, there will be occasions where members of the public may wish to raise minor issues that have not become problems and do not represent a failure on behalf of the GLA that has had a detriment on the individual in question. These will not be treated as complaints, but rather are an important part of trying to seek an early and first resolution.

### *Separate and dedicated procedures*

4.10 The following fall outside this Policy and will be dealt with via separate, dedicated mechanisms:

- complaints about the standard of behaviour of the Mayor, Statutory Deputy Mayor, Deputy Mayor for Policing and Crime (where they are an Assembly Member), and London Assembly Members, which are covered by the GLA's Code of Conduct for Members and are handled by the Monitoring Officer (such complaints can, however, be submitted via the GLA's standard online complaints form). The guidance for making a complaint about an elected Member can be found online [here](#)
- complaints about the handling of Freedom of Information (FOI) requests, Subject Access Requests and the GLA's handling of personal data (again, such complaints can be submitted

via the GLA's standard online complaints form). More information about how we handle FOI complaints is [here](#); and data-protection [here](#)

- complaints pertaining to one or other of the GLA's Functional Bodies, which should be submitted directly to the body in question
- complaints from GLA employees about Human Resources (HR) issues; including appointments, dismissals, performance, pay, pensions, ethical matters and discipline. These are dealt with separately under the GLA's HR policies and procedures

4.11 Note in some cases a complaint may trigger other, existing mechanisms; for example, if your complaint relates to the standard of behaviour of GLA staff, then we will investigate it with reference to relevant HR procedures. In such cases we will take a pragmatic approach and may not always follow the stage 1 and 2 process exactly as described in part B. We will, however, still keep you informed about the progress and outcome of our investigations as far as possible.

4.12 In some cases, the GLA may redirect complaints to third-party organisations, including where that third-party is responsible for the quality of the service in question. If we intend to do that, we will explain our intention first to the complainant and follow data protection rules.

## 5. Responsibilities and implementation

5.1 The Assistant Director of External Relations is responsible for the GLA's complaints policy and procedures – and ensuring they are reviewed at least every two years. They have authority to amend and approve this policy. In exercising this authority, the Assistant Director should seek input from the GLA's internal Governance Steering Group. The Senior Manager Public Liaison may make minor, drafting changes and factual updates to this policy without the need to seek sign-off from the Assistant Director.

5.2 The Public Liaison Unit (PLU) is responsible for recording and categorising complaints on the GLA's correspondence management system and monitoring and reporting on the numbers of complaints and response times. PLU is also responsible for identifying any organisation-wide learning arising from complaints. PLU will assist members of the public in making a complaint, where they are unable to complain independently using the standard channels; and, in doing so, will help the GLA meet its obligations under the Public Sector Equality Duty.

5.3 Managers (at the levels described in part B) must own stage one and stage two responses, which are in their name, seeing that the complaint is investigated thoroughly (with all relevant evidence sought and assessed) and in a timely manner. They are also responsible for ensuring there are robust mechanisms within their areas of responsibility for identifying, responding to and learning from complaints. The Chief Officer is responsible for ensuring there is appropriate engagement with the Local Government and Social Care Ombudsman in respect of complaints about the GLA if it is investigated.

5.4 All members of staff must follow this policy and contribute to its effective implementation – and should aim to get things right first time. That includes ensuring complaints are identified (i.e. flagged to PLU) and responded to thoroughly and promptly.

### *Dealing with complaints relating to third parties*

The GLA provides money to third parties either to run schemes on our behalf (this will usually be through a contractual relationship) or to run a project that a third party owns but that aligns with the GLA's priorities (a grant award).

Complaints about GLA grant funding processes are covered by this policy. However, while the GLA has an interest in the operation of projects supported by GLA grant awards, it is not responsible for the delivery of such projects. Complaints we receive about these projects fall outside this policy; but may inform our monitoring of and learning from such projects. If the complaint is about misuse of GLA funds, then we will investigate the matter thoroughly in line with our anti-fraud framework.

When a contractor is running a service on our behalf, then complaints about the service are, de facto, 'GLA complaints'. It may, however, be necessary for officers to set up bespoke complaints and resolution processes whereby the contractor receives the complaint in the first instance, with an escalation mechanism to the GLA. The core principle is that in all cases it should be transparent to everyone involved – the customer, the contractor and the GLA – who has responsibility for service quality, how complaints are handled and what, ultimately, the process for redress is.

Finally, the GLA may be working with partners to provide a service. Here the GLA will again ensure it is clear to the public who is responsible and what the process for complaining is.

### *Flexing our approach and dealing with sensitive complaints*

In certain circumstances, it may be necessary to adapt the GLA standard complaints procedure. In particular, and while complaints should be subject to a stage one and then as necessary stage two response, where the complaint is particularly serious (or if there is a conflict of interest) it may be appropriate for the investigation to be undertaken and the response to come from a more senior manager; for example, an Assistant Director at Stage one.

Depending on the nature of the complaint, the investigating officer may need to seek advice from other teams; for example, HR&OD, the Governance team, the Monitoring Officer, Legal or Internal Audit. This is more likely to be the case where the complaint is complex, sensitive or related to staff conduct. And in these cases, it may be necessary for the complaint process to run in parallel with other existing processes.

Where complaints are sensitive, it may be necessary to treat the complaint as confidential (and to protect the name of the complainant) and to maintain tight control over who has access to information about it. PLU will, where it receives a complaint directly, undertake an initial assessment to support this process. Otherwise the manager in question should immediately seek the advice of PLU.

## 6. Monitoring, evaluation and equality

6.1 PLU will monitor and analyse complaints data to ensure the GLA is improving its services and meeting its equalities duty to eliminate discrimination, advance equality of opportunity and foster good relations between different people. This will comprise:

- an ongoing assessment of complaints areas so that trends are identified, and early action can be taken to address problems;
- on a monthly basis, circulation of complaints statistics to teams; and
- an annual report providing an overview of complaints data, performance, themes and any learning points, which will be considered by the Governance Steering Group.



## B. Making a Complaint

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### 1. Timeframe

1.1 Complaints should generally be made to the GLA as soon as possible; but within six months of the incident's occurrence. If it is longer the GLA may ask for an explanation as to why the complaint was not made within this time frame.

### 2. How to make a complaint in writing

2.1 Complaints should preferably be made in writing and this can be done via the following methods:

- the [complaint, comment and suggestion form](#)
- email to [mayor@london.gov.uk](mailto:mayor@london.gov.uk)
- Letter to:  
Public Liaison Unit - Complaints  
City Hall  
Kamal Chunchie Way  
London  
E16 1ZE

2.2 Complaints made via other routes – for example, direct to a known contact in a GLA team – must be forwarded to PLU. PLU will log all complaints on the GLA's correspondence management system and classify complaints as stage one/two as appropriate.

### 3. Complaining over the phone

3.1 If an individual cannot make a written complaint, they can liaise with the Public Liaison Unit, who will assist them in making a written complaint:

- telephone: 0207 983 4000 (note that all calls made to this number are recorded)

3.2 Where PLU has agreed to assist a complainant, they will:

- take clear written notes on the details of the complaint and share these with the complainant
- record the name and contact details of the complainant, including telephone number, email address and postal address
- record the date and time of the complaint
- log the complaint and ensure it is shared with the relevant team

3.3 PLU will also support the team in question in providing a response to the complaint in an accessible format. The GLA will consider requests to provide the complaint response in an alternative format – e.g. braille or easy read – meeting such requests where it is reasonable to do so.

## C. Dealing with a complaint

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### 4. Stage one complaints

4.1 PLU will identify the area and team which should respond to the complaint.

4.2 The GLA will acknowledge the receipt of each complaint within five working days and tell the complainant that their correspondence is being treated as a complaint under this policy – with a high-level overview of the process that will be followed.

4.3 The complaint will be investigated and responded to by a manager, i.e. a person who reports directly to an Assistant Director or otherwise and has senior responsibilities for the area of work in question.

4.4 In a small number of cases it may not be appropriate for the responsible manager to respond to the complaint; for example, because their direct actions are the subject of the complaint. In such circumstances, the relevant Assistant Director will identify another individual who can lead the investigation and respond to the complaint.

4.5 The GLA aims to investigate and respond in full to a stage one complaint in 20 working days. If the complaint cannot be resolved within 20 working days, the investigating manager's team will keep the complainant updated on its progress. If the complaint will take longer than 20 working days to reply to, this will be communicated to the complaint at the earliest opportunity, with an explanation as to why the 20 working days target cannot be met.

4.6 Response to complaints will include the following information:

- confirmation the complaint was treated at stage one
- who investigated the complaint
- what form the investigation took (who was involved, what information was sought, how it was assessed). The investigating manager is responsible for involving and seeking advice from relevant GLA teams
- the outcome of the investigation: whether the GLA accepts that it fell below the standards of service that should be expected of it or not
- an apology, if there was any fault
- actions will be taken to put things right, if any
- how, if relevant, the GLA will learn from the complaint
- details of how the complainant can escalate their complaint to stage two, if they are dissatisfied with the stage one response:

*'If you are unhappy with this stage one response, you can escalate your complaint to the next stage of the complaints procedure. At stage two, your complaint will be referred to an Executive Director who will investigate the matter further.'*

## 5. Stage two complaints

5.1 If a complainant is unhappy with the response to their complaint at stage one, they can ask for the complaint to be escalated to the second stage. In doing so, the complainant should clearly detail why they believe their complaint was not addressed in the first stage.

5.2 The process will proceed as detailed above for stage one above, but this time the investigation will be overseen by the Executive Director for the area in question and the response will be in their name. The Executive Director will need to ensure a proportionate approach to the investigation is taken, including the extent to which any new evidence needs to be gathered. It is important, however, that the Executive Director considers the facts and process undertaken to date afresh and comes to their own, independent view on the complaint.

5.3 The response will include the following information:

- confirmation the complaint was treated at stage two
- who investigated the complaint
- what form the investigation took (what additional investigations were undertaken above and beyond those at stage one; and how the evidence gathered at stage one was reassessed)
- the outcome of the investigation: whether the GLA upholds the response it issued at stage one or not
- depending on the above, an apology, any new/further actions to put things right and how the GLA will learn from the complaint
- details of how the complainant can escalate their complaint to the Ombudsman, if they are dissatisfied with the stage two response:

*'If you are unhappy with the response you received at stage two, you can contact the Local Government and Social Care Ombudsman [www.lgo.org.uk](http://www.lgo.org.uk)*

## 6. Local Government and Social Care Ombudsman complaints

6.1 The Local Government and Social Care Ombudsman is the final stage for complaints about the GLA. It investigates complaints in a fair and independent way and is a free service. The GLA complaints policy must be exhausted before a complainant can approach the Ombudsman to investigate the issue.

6.2 The Chief Officer will appoint a GLA officer to support the LGO's review of any complaints the Ombudsman is investigating; and the response will be in the Chief Officer's name. The review will be guided by the LGO and the information the LGO case officer wishes to review; but it is likely the GLA will want to assess the stage one and two responses and consider whether any further evidence needs to be gathered, and/or if a fresh review of the existing evidence needs to be undertaken. The Chief Officer will also consider whether the appointed GLA officer needs to be someone who has not, to that point, been involved in assessing the complaint (e.g. responding at stage one or stage two).

6.3 The response will be provided within any timescales set by the Ombudsman.