



St Edmundsbury
BOROUGH COUNCIL

B266

Performance and Audit Scrutiny Committee 25 October 2010

Biannual Corporate Complaints and Compliments Digest

SUMMARY

Attached is the Biannual Corporate Complaints Digest covering the period from 1 April 2010 to 30 September 2010.

The aim of the digest is to provide an overview of the quantity and range of corporate complaints (complaints monitored by the Chief Executive's Office) that the council receives, as well as monitoring our effectiveness at responding and learning from any mistakes that have been made. 30 corporate complaints were received during this half of the financial year.

In addition, the report highlights the 30 compliments which have been received across the authority during the reporting period and outlines the teams and services who have received them.

Attached, at Appendix A, is a report from the Local Government Ombudsman which summaries the complaints about the council which were investigated in 2009/10.

PURPOSE OF THE REPORT

Members are asked to consider the latest digest and make any recommendations to Cabinet arising from the information in this report.

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1. Introduction

The aim of the digest is to provide an overview of the number and type of corporate complaints that the council receives, as well as monitoring effectiveness at responding and learning from any mistakes that have been made.

The council operates a two step complaints procedure. Step 1 involves a complainant who is dissatisfied with any part of the council's service, or wishes to point out a fault, making a complaint by email, telephone, and letter or via one of the feedback forms available from reception and on-line. Complainants receive a letter within five working days which provides them with the name of the person dealing with the complaint and either responds to the complaint and explains how the situation has been dealt with or lets them know that the complaint will require more investigation and advises when they can expect to receive a full reply.

If a complainant is not satisfied with the response received under Step 1 of the procedure, they can request that the complaint moves to Step 2. This involves the complaint being investigated by Legal and Democratic Services who will provide an explanation of how the situation has been handled, the investigations that have taken place and whether the response provided is reasonable and fair. If a complaints progresses from a Step 1 to a Step 2, both are logged for the purposes of this report.

The council aims to fully respond to 90% of Step 1 and Step 2 complaints within 15 working days. Whilst the council has a target of dealing with all complaints within 15 working days it is understandable that some complaints are more complex to respond to and that these complaints will take longer than the target to resolve, particularly with Step 2 complaints which are independently investigated.

The report also includes details on the number of compliments that the council receives. The monitoring of compliments is important to the authority as it provides an opportunity to praise services, teams or individual members of staff who have been praised by the customer for delivering an excellent service.

2. Local Government Ombudsman report 2009/10

Attached at Appendix A is the Local Government Ombudsman Review for 2009/10. It summarises the complaints it investigated about the council. It shows that there were nine enquiries and complaints received about the council in 2009/10 which was down from 14 in the previous year. Of this nine, only six were considered by the investigative team.

3. Complaints received and speed of response

In the current financial year 2010/11, 30 complaints have been received up to 30 September 2010. In the same period last year, 20 complaints were received. Indeed for the whole of the last financial year (2009/10) the council received and responded to 30 complaints. The table below illustrates these figures. The table shows that in the first half of the year alone, the council has already received and responded to the same number of complaints as we received in the whole of the previous year.

Response rate to complaints comparison with the same period last year:

	Total number received and completed	Number responded to within target of 15 working days (or within extension agreed with complainant)	Percentage responded to within target of 15 working days
April 09 – September 09 (half year)			
Step 1	14	10	71%
Step 2	6	3	50%
April 09 – March 10 (full year)			
Step 1	22	17	77%
Step 2	8	4	50%
April 10 – September 10 (half year)			
Step 1	19	16	84%
Step 2	11	9	82%

4. Analysis of corporate complaints received by Directorate

Complaints are broken down by directorate

	Chief Executive's	Community	Environment	Monthly Total
April 10	1	1	3	5
May 10	1	1	3	5
June 10	0	0	0	0
July 10	2	3	1	6
August 10	1	1	4	6
September 10	1	4	3	8
Total complaints received	6	10	14	30

5. What issues were raised through the complaints procedure during this period and what lessons have been learned?

	Service	Complaint regarding	Lessons learned
Chief Executive's	Democratic services	Dissatisfaction with consideration of a grant application.	Complaint not upheld. All relevant information was available in order to reach a decision.
	Democratic services (step 2)	Dissatisfaction with the definition and interpretation of a grant application.	Complaint not upheld. The application had been considered correctly and in accordance with the Grant Policy.
	Revenues and benefits	Council tax payment.	Complainant received a written apology for the errors made in the setting up of a direct debit payment.
	Revenues and benefits (step 2)	Delays in determination of housing benefit claim.	Complaint not upheld. There was no unreasonable delay in reassessing the benefit entitlement.
	Revenues and benefits	Complications relating to rent payment.	Complaint not upheld. It was found that the service had acted correctly given the information available.
	Revenues and benefits	Counter service provided by Revenues and Benefits.	Apologies were made for any misunderstanding and assurances given that customer care is important.
Community	Housing	Priority allocated on the Home -Link Scheme.	Complaint not upheld as insufficient information provided to support re-banding.
	Housing (step 2)	Priority allocated on the Home-Link Scheme.	The complaint not upheld. Insufficient evidence provided to support re-banding.
	Housing	Failure to deal with housing need.	Complaint not upheld. A letter was sent to the complainant detailing why he did not qualify for an alternative banding.
	Housing (step 2)	Misleading advice given by the Housing Team.	Complaint not upheld as advice given would not have made any difference to the decision. However, information packs have been reviewed and refresher training for Housing Options Advisors has been provided.
	Parks	Accident on a bouncy castle at an event in the Abbey Gardens	Reassurance was given that appropriate risk assessments had been undertaken.
	Parks (step 2)	Complaint regarding an injury sustained at an event in the Abbey Gardens	Complaint not upheld. The council has sufficient procedures in place as required by law.
	Parks	Inadequate response to an incident at the Abbey Gardens	Apologies given for problems experience during visit to the Abbey Gardens.
	Parks (step 2)	Inadequate response to an incident at the Abbey Gardens	It was accepted that the response to the incident could have been better handled by staff on site at the time. Recommendation that refresher training be given to all park rangers.
	Parks	Alleged breach of Data Protection Act	Complaint not upheld. All officers involved acted professionally.
Licensing	Refusal of a Temporary Event Notice	Complaint was not upheld. A detailed explanation was provided about the timescales involved for a Temporary Event Notice application.	

	Service	Complaint regarding	Lessons learned
Environment	Planning (step 2)	Enforcement notice on land	The complaint was not upheld. The Planning Enforcement Team acted properly and professionally and the Enforcement Notice was served correctly.
	Planning (step 2)	Granting of planning permission for a new build	Complaint not upheld. The planning application was properly considered and decisions taken were in accordance with the council's policies and procedures.
	Planning	Local Development Framework process	Complaint not upheld. The complainant received a response to the issues raised about the LDF process.
	Planning (step 2)	Local Development Framework process	Complaint not upheld. The consultation process is sound and this is also the conclusion of the Planning Inspector.
	Car parks	Rude staff in the car park service	Complaint investigated by the Manager of the service and staff reminded of the importance of good customer service.
	Car parks	Unfair Excess Charge Notice	Complaint not upheld. The council correctly applied its policy of failure to display a ticket
	Car parks	Parking charges on public holidays	Complaint not upheld as parking charges apply on all public holidays.
	Car parks (step 2)	Parking machines unclear regarding charge on Good Friday	Apologies given that some car park machine signs incorrectly stated no charge on public holidays. Signs have now been amended.
	Car parks	Car park ticket machines not working	Reassurance was provided that ticket machines are linked to a management system which provides an alert if there are problems.
	Waste management	Lack of communication about the change of bin collection day (two changes were made)	Apologies were made for the inefficient service provided. A second change of date occurred because the route required a restricted access vehicle.
	Waste management	Request to review non-disclosure of trade waste information	Complaint not upheld. The council had correctly applied the Environmental Information Request.
	Property and engineering	Ownership and ongoing problems with sewer	Complaint not upheld. A detailed response was provided which addressed all aspects of the complaint.
	Property and engineering (step 2)	Ownership and ongoing problems with sewer	Complaint not upheld and detailed investigation and response was provided.
Property and engineering	Ownership and maintenance of sewer	Complaint not upheld. A detailed response to the issues raised was sent.	

6. Compliments received between April 2010 and September 2010

As part of the monitoring of feedback from our customers, the Chief Executive's Office maintains records of compliments received for particular services or individuals. Services are asked to pass on positive feedback in order to promote a culture which acknowledges and celebrates excellent customer service and also provides an opportunity to share that learning with other staff members.

This section of the report provides a breakdown of the number of compliments received during the financial year by directorate and also provides details of the individual compliments that have been received.

6.1 Analysis of number of compliments received by each directorate from April 2010 to September 2010

Directorate	Total compliments received
Chief Executives	5
Community	23
Environment	2
TOTAL	30

Breakdown of compliments received from April 2010 to September 2010

Directorate	Service	Compliment/Comment Details
Chief Executive's	Communications	A compliment passed, via a councillor: I thought you would like to know that a resident took the trouble to telephone me on Friday to praise the help she was given by Communications. The lady in question was anxious to know the route of the cycle race and, being unable to find anything on the website, she contacted the Communications Department. Not only did she receive all the information she required but she was delighted to see the information appeared on the website within a couple of hours.
	Legal	A card to say thank you for returning some forms
	Revenues and benefits	Thanks given to everyone in the Housing Benefit Department, for all the help and support received through times of need. Everyone is doing a fantastic job.
	Revenues and benefits	Letter to say that the Benefits Officer has been such a great help while dealing with claims for her sister. The Officer was very kind and stayed on after finishing time to make sure that all paperwork was complete. She also found the ladies on the desks most helpful (Homelink etc). Noted that it was nice to have people that are willing to listen to you. Big thanks given to the team.
	Revenues and benefits	A note from the JobcentrePlus (JCP) to say that feedback from customers regarding the Revenues and Benefits Customer Advisor commenting on how thorough, patient, helpful, informative and welcoming they have found her. Wanted to let the manager know how well thought of the Officer is at the JCP and by lone parents who have seen her in person.
Community	Cemeteries	Thank you to the team for dealing with a grave space.
	Elections	A thank you for offering electronic voter registration. This method of communication should be applied, if possible, to other areas of local government which would, no doubt, offer savings to rate payers. Well done St Edmundsbury.
	Environmental Health	I am most impressed by the efficient manner you and your colleagues have dealt with [a Home Renewable Energy Grant]

Directorate	Service	Compliment/Comment Details
	Housing	I would just like to say a big thank you for taking time out of your busy day to support my learning development in local housing delivery. I found both days very useful and it was most interesting to hear and see the challenges you are facing at a local level. I was particularly impressed with how professional, proactive and positive your teams are.
	Heritage	A card to thank the leisure team for their help and kindness.
	Heritage	Thank you from the Rainbow Preschool for the complimentary family ticket to West Stow (for a fundraising event)
	Heritage	An email to convey our sincere gratitude for your excellent and attentive handling of our 'lost bag' situation. It was such a relief to collect it intact last Saturday from your reception. My partner's first reaction on getting it back was "If I was wealthy I would want to make a very large donation to the excellent work they do at West Stow". Lost bags aside, we both found our visit to the site absolutely fascinating. To learn that some of the dwellings are no more than three years old yet look at least 1000 years old left us speechless. It is testimony to the integrity of the work you do there.
	Heritage	We had a lovely day at West Stow and thank you all again for making us so welcome.
	Heritage	Several letters from pupils at the Priory School thanking Moyse's Hall Museum staff.
	Heritage	Thank you for an enjoyable day at Moyse's Hall
	Heritage	Thank you to Moyse's Hall staff for their help and assistance at an event.
	Heritage	Very many thanks indeed. I am very thrilled with your scholarly report on my fossil-sponge.
	Parks	I wanted to express my sincere thanks for all your hard work in dealing with the problems we experienced [at Castle Playing Field], and the quick and effective response to our petition. Everyone is delighted with the changes and we really appreciate everything that was done.

Directorate	Service	Compliment/Comment Details
	Parks	The tree surgeons came and did a fabulous job trimming and tidying up the trees on the green outside my house! They worked steadily all day and not only gave the trees a good trim but also left them with a beautiful shape, never an easy job! Please pass on my thanks to them for a job very well done! ps they also left the area spotless, nice one lads...
	Parks	A telephone call to say that a customer was very happy with the tree works that were carried out today. Very pleased and the lighting situation is 10 times better.
	Parks	Would like to pass on his thanks for the efficient action taken against the branches fallen into the middle of the green in Church Close. Branches were blown down due to strong winds.
	Parks	Your colleagues have just finished removing the three dead trees from the green outside our house. They were clean, quick, neat and tidy and the whole green looks very much the better now. They were also pleasant to speak to, especially with regard to what they were doing and why.
	Parks	Thank you to the Parks Team for the Bury Race for Life. It was extremely hot and the team's support was great in the car park. The support leading up to the event and on event day was great so thank you for all your support.
	Parks	I would like to thank you for the work that was carried out today on the Robinia tree, which was removed from outside my property. I can't believe how much light it has brought back to the rooms in the front of my house and numerous neighbours have commented on how much better/brighter it looks from the outside.
	Parks	Thanks to the council for getting the hedging trimmed and the chap(s) who did the trimming did a splendid job.
	Parks	What a lovely day was provided in the summer for the children and families in Haverhill on the recreation ground. Lots of families attended the event and it was appreciated by all.
	Parks	A letter following a visit by journalists from the USA and Canada: We wanted to thank you for your time and for your kindness—the citizens of Bury St Edmunds must be the most hospitable people in all of England.

Directorate	Service	Compliment/Comment Details
		The Abbey Gardens were amazing and the rose garden was breath taking. Please express our thanks and gratitude to the rest of the staff that helped make the tour so enjoyable. We plan to visit again and spend a couple of weeks.
	Parks and Property	The support and understanding we [local residents] have had from the council on this issue has been exemplary, and on behalf of all I would like to extend our appreciation. A fine example of how SEBC can work as one with local residents.
Economy and Environment	Parking	Thank you very much for enforcing the parking restrictions on the Broadway, Eastgate Street. It has made life much easier for the residents.
	Waste and Street Scene Services	Email to compliment the council on the cleanliness of Bury. Where, in my old town, there was just litter on the streets, in Bury the litter seems to be replaced by flowers which I'm sure helps make all Bury residents proud to live here.

Local Government

OMBUDSMAN

**The Local Government Ombudsman's
Annual Review**

St Edmundsbury Borough Council

**for the year ended
31 March 2010**

Local Government Ombudsmen (LGOs) provide a free, independent and impartial service. We consider complaints about the administrative actions of councils and some other authorities. We cannot question what a council has done simply because someone does not agree with it. If we find something has gone wrong, such as poor service, service failure, delay or bad advice, and that a person has suffered as a result, we aim to get it put right by recommending a suitable remedy. We also use the findings from investigation work to help authorities provide better public services through initiatives such as special reports, training and annual reviews.

Contents of Annual Review

Section 1: Complaints about St Edmundsbury Borough Council 2009/10..	3
Introduction	3
Enquiries and complaints received	3
Complaint outcomes	3
Liaison with the Local Government Ombudsman	4
Training in complaint handling	4
Conclusions	4
Section 2: LGO developments.....	5
Introduction	5
New schools complaints service launched	5
Adult social care: new powers from October	5
Council first	5
Training in complaint handling	6
Statements of reasons	6
Delivering public value	6
Appendix 1: Notes to assist interpretation of the statistics 2009/10	7
Appendix 2: Local authority report 2009/10	

Section 1: Complaints about St Edmundsbury Borough Council 2009/10

Introduction

This annual review provides a summary of the complaints we have dealt with about St Edmundsbury Borough Council. We have included comments on the authority's performance and complaint-handling arrangements, where possible, so they can assist with your service improvement.

I hope that the review will be a useful addition to other information your authority holds on how people experience or perceive your services.

Two appendices form an integral part of this review: statistical data for 2009/10 and a note to help the interpretation of the statistics.

Enquiries and complaints received

A total of nine enquiries and complaints was received about your Council in 2009/10, down from 14 in the previous year. Two were premature (because the Council had not first been given an opportunity to deal with the complaint itself) and two enquirers were given advice.

Five of complaints were passed to the investigation team to consider. Two of these were about planning applications. The others were: an environmental health case about conditions at a pub, a complaint about planning enforcement and a complaint about the maintenance of grass verges outside the complainant's home.

Complaint outcomes

We decided six complaints against your Council in 2009/10. In two cases, I found insufficient evidence of fault by your Council. These were about planning applications and, in essence, concerned the merits of the Council's decisions, whereas my role is to consider service failure and administrative fault causing injustice.

Sometimes I use my discretion not to pursue a complaint because even if the Council has been at fault this has not resulted in an injustice to the complainant that warrants pursuit of the complaint or a remedy. In two cases, concerning the pub and in a case concerning council tax banding, I exercised my discretion not to continue the investigation. In another case, I concluded the complaint was outside my jurisdiction to investigate matters. This case concerned the Council's actions in demolishing a wall: there was a specific court remedy under the Building Act which I expected the complainant to pursue.

A 'local settlement' is a complaint where, during the course of our investigation, a council takes or agrees to take some action that we consider to be a satisfactory response to the complaint. I agreed a local settlement in one case. This involved the maintenance of grass verges outside the complainant's home. The Council had agreed to consider hardening of the grass verges to prevent further damage to them and also to a consultation with residents on the action to be taken. There was a delay in taking the agreed action. In settling the complaint, the Council offered an apology to the complainant and agreed a small sum of compensation for the time and trouble experienced by the complainant.

Liaison with the Local Government Ombudsman

We ask Councils to respond to our enquiries within 28 days. This year, my investigatory team made only one enquiry, and you responded in 21 days.

Training in complaint handling

I would like to take this opportunity to remind the council that part of our role is to provide advice and guidance about good administrative practice. We offer training courses for all levels of local authority staff in complaints handling and investigation. All courses are presented by experienced investigators. They give participants the opportunity to practise the skills needed to deal with complaints positively and efficiently. We can also provide customised courses to help authorities to deal with particular issues and occasional open courses for individuals from different authorities.

I have enclosed some information on the full range of courses available together with contact details for enquiries and bookings.

Conclusions

I welcome this opportunity to give you my reflections about the complaints my office has dealt with over the past year. I hope that you find the information and assessment provided useful when seeking improvements to your authority's services.

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June 2010

Section 2: LGO developments

Introduction

This annual review also provides an opportunity to bring councils up to date on developments in the LGO and to seek feedback.

New schools complaints service launched

In April 2010 we launched the first pilot phase of a complaints service extending our jurisdiction to consider parent and pupil complaints about state schools in four local authority areas. This power was introduced by the Apprenticeships, Skills, Children and Learning Act 2009.

The first phase involves schools in **Barking and Dagenham, Cambridgeshire, Medway and Sefton**. The Secretary of State no longer considers complaints about schools in these areas. In September the schools in a further 10 local authority areas are set to join the pilot phase.

We are working closely with colleagues in the pilot areas and their schools, including providing training and information sessions, to shape the design and delivery of the new service. It is intended that by September 2011 our jurisdiction will cover all state schools in England.

A new team in each office now deals with all complaints about children's services and education on behalf of the Ombudsman. Arrangements for cooperation with Ofsted on related work areas have been agreed.

For further information see the new schools pages on our website at www.lgo.org.uk/schools/

Adult social care: new powers from October

The Health Act 2009 extended the Ombudsmen's powers to investigate complaints about privately arranged and funded adult social care. These powers come into effect from 1 October 2010 (or when the Care Quality Commission has re-registered all adult care providers undertaking regulated activity). Provision of care that is arranged by an individual and funded from direct payments comes within this new jurisdiction.

Each Ombudsman has set up a team to deal with all adult social care complaints on their behalf. We expect that many complaints from people who have arranged and funded their care will involve the actions of both the local authority and the care provider. We are developing information-sharing agreements with the Care Quality Commission and with councils in their roles as adult safeguarding leads and service commissioners.

Council first

We introduced our Council first procedure in April last year. With some exceptions, we require complainants to go through all stages of a council's own complaints procedure before we will consider the complaint. It aims to build on the improved handling of complaints by councils.

We are going to research the views of people whose complaints have been referred to councils as premature. We are also still keen to hear from councils about how the procedure is working, particularly on the exception categories. Details of the categories of complaint that are normally treated as exceptions are on our website at www.lgo.org.uk/guide-for-advisers/council-response

Training in complaint handling

Demand for our training in complaint handling has remained high, with 118 courses delivered over the year to 53 different authorities. Our core Effective Complaint Handling course is still the most popular – we ran some of these as open courses for groups of staff from different authorities. These are designed to assist those authorities that wish to train small numbers of staff and give them an opportunity to share ideas and experience with other authorities.

The new Effective Complaint Handling in Adult Social Care course, driven by the introduction of the new statutory complaints arrangements in health and adult social care in April 2009, was also popular. It accounted for just over a third of bookings.

Over the next year we intend to carry out a thorough review of local authority training needs to ensure that the programme continues to deliver learning outcomes that improve complaint handling by councils.

Statements of reasons

Last year we consulted councils on our broad proposals for introducing statements of reasons on the individual decisions of an Ombudsman following the investigation of a complaint. We received very supportive and constructive feedback on the proposals, which aim to provide greater transparency and increase understanding of our work. Since then we have been carrying out more detailed work, including our new powers. We intend to introduce the new arrangements in the near future.

Delivering public value

We hope this information gives you an insight into the major changes happening within the LGO, many of which will have a direct impact on your authority. We will keep you up to date through LGO Link as each development progresses, but if there is anything you wish to discuss in the meantime please let me know.

Mindful of the current economic climate, financial stringencies and our public accountability, we are determined to continue to increase the efficiency, cost-effectiveness and public value of our work.

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June 2010

Appendix 1: Notes to assist interpretation of the statistics 2009/10

Table 1. LGO Advice Team: Enquiries and complaints received

This information shows the number of enquiries and complaints received by the LGO, broken down by service area and in total. It also shows how these were dealt with, as follows.

Premature complaints: The LGO does not normally consider a complaint unless a council has first had an opportunity to deal with that complaint itself. So if someone complains to the LGO without having taken the matter up with a council, the LGO will either refer it back to the council as a 'premature complaint' to see if the council can itself resolve the matter, or give advice to the enquirer that their complaint is premature.

Advice given: These are enquiries where the LGO Advice Team has given advice on why the LGO would not be able to consider the complaint, other than the complaint is premature. For example, the complaint may clearly be outside the LGO's jurisdiction.

Forwarded to the investigative team (resubmitted premature and new): These are new cases forwarded to the Investigative Team for further consideration and cases where the complainant has resubmitted their complaint to the LGO after it has been put to the council.

Table 2. Investigative Team: Decisions

This information records the number of decisions made by the LGO Investigative Team, broken down by outcome, within the period given. **This number will not be the same as the number of complaints forwarded from the LGO Advice Team** because some complaints decided in 2009/10 will already have been in hand at the beginning of the year, and some forwarded to the Investigative Team during 2009/10 will still be in hand at the end of the year. Below we set out a key explaining the outcome categories.

MI reps: where the LGO has concluded an investigation and issued a formal report finding maladministration causing injustice.

LS (local settlements): decisions by letter discontinuing our investigation because action has been agreed by the authority and accepted by the LGO as a satisfactory outcome for the complainant.

M reps: where the LGO has concluded an investigation and issued a formal report finding maladministration but causing no injustice to the complainant.

NM reps: where the LGO has concluded an investigation and issued a formal report finding no maladministration by the council.

No mal: decisions by letter discontinuing an investigation because we have found no, or insufficient, evidence of maladministration.

Omb disc: decisions by letter discontinuing an investigation in which we have exercised the LGO's general discretion not to pursue the complaint. This can be for a variety of reasons, but the most common is that we have found no or insufficient injustice to warrant pursuing the matter further.

Outside jurisdiction: these are cases which were outside the LGO's jurisdiction.

Table 3. Response times

These figures record the average time the council takes to respond to our first enquiries on a complaint. We measure this in calendar days from the date we send our letter/fax/email to the date that we receive a substantive response from the council. The council's figures may differ somewhat, since they are likely to be recorded from the date the council receives our letter until the despatch of its response.

Table 4. Average local authority response times 2009/10

This table gives comparative figures for average response times by authorities in England, by type of authority, within three time bands.

LGO Advice Team

Enquiries and complaints received	Housing	Benefits	Public Finance inc. Local Taxation	Planning and building control	Transport and highways	Other	Total
Formal/informal premature complaints	2	0	0	0	0	0	2
Advice given	0	1	1	0	0	0	2
Forwarded to investigative team (resubmitted prematures)	0	0	0	1	0	1	2
Forwarded to investigative team (new)	0	0	0	2	1	0	3
Total	2	1	1	3	1	1	9

Investigative Team

Decisions	MI reps	LS	M reps	NM reps	No mal	Omb disc	Outside jurisdiction	Total
2009 / 2010	0	1	0	0	2	2	1	6

Response times	FIRST ENQUIRIES	
	No. of First Enquiries	Avg no. of days to respond
1/04/2009 / 31/03/2010	1	21.0
2008 / 2009	5	25.0
2007 / 2008	1	27.0

Average local authority resp times 01/04/2009 to 31/03/2010

Types of authority	<= 28 days %	29 - 35 days %	> = 36 days %
District Councils	61	22	17
Unitary Authorities	68	26	6
Metropolitan Authorities	70	22	8
County Councils	58	32	10
London Boroughs	52	36	12
National Parks Authorities	60	20	20