

Statutory Social Care Annual Report

Complaints and Customer Feedback

For the period 1 April 2020 to 31 March 2021

INTRODUCTION	3
i. Background	3
ii. Purpose	3
iii. Period covered and data	3
SECTION ONE: SUMMARY AND OVERVIEW	
1.1 Executive Summary	4
1.2 Statutory Complaint trends and outcomes	5
1.3 Statutory Local Government Ombudsman (LGSCO) complaints received	6
SECTION TWO: ADULT SOCIAL CARE FEEDBACK	
2.1 Summary of ASC feedback	7
2.2 Breakdown of complaints by stage and outcome	7
2.3 What do people complain about?	8
2.4 Learning for ASC	9
2.5 Services which were the subject of compliments	11
2.6 Joint Complaints	11
2.7 Ombudsman Complaints	11
2.8 Ombudsman identified learning for adult social care complaints	12
SECTION THREE: CHILDREN AND YOUNG PEOPLE FEEDBACK	
3.1 Summary of CYP and CSC feedback	14
3.2 Breakdown of complaints by stage	15
3.3 Breakdown of complaints by outcome	15
3.4 What do people complain about in the statutory process?	16
3.5 Learning	16
3.6 Summary of non-statutory complaints	18
3.7 What are non-statutory CSC complaints about?	18
3.8 Services which were the subject of compliments and comments	18
3.9 Ombudsman Complaints	19
3.10 Ombudsman identified learning for children's complaints	19

Introduction

i. Background

Local authorities are legally required to establish complaints procedures to deal with complaints about their social care functions. The complaints procedure for children and young people is covered by the Children Act 1989 and the Department for Skills and Education produced guidance, 'Getting the Best from Complaints' (2006), which outlines the procedures which local authorities must have in place. For adult social care, this report is also produced in accordance with the requirements of the Local Authority Social Services and National Health Service Complaints Regulations (2009).

Lancashire County Council (LCC) is represented on the Committee of the National Complaints Managers Group (England) and the North West Complaints Managers Group, which comprises 23 local authorities. These groups aim to provide a forum where complaints staff can learn and share best practice, develop and implement local practice standards, discuss performance and problem solve. These groups are also consulted on proposed changes to legislation and learning from complaints by the Association of Directors of Adult Social Services and the Association of Directors of Children's Services.

ii. Purpose

The purpose of the Annual Report is to review the operation of the complaints process over a 12-month period, including statistical data, and to keep the council informed about complaint themes and how effective its current arrangements are for handling customer complaints. It offers an analysis of what the information obtained from the operation of the complaints process means for the council.

This report also includes information on compliments and comments received by the council.

iii. Period covered and data

The report covers the period 1 April 2020 to the 31 March 2021. The report makes extensive use throughout of data available from the Customer Feedback System which records all statutory social care complaints and feedback for the council. The statistical information presented within this report can be verified by reference to this database and is based on the date feedback is received. All percentages and costs are rounded to the nearest whole number.

Section One	Summary and Overview highlights the key messages from the report and gives the overall picture across the council
Section Two	Statistical data, analysis and learning in relation to Adult Social Care Services .
Section Three	Statistical data and further information and analysis and learning in relation to all Children's Services .

If you require any additional information please contact Lancashire County Council Complaints Team on 01772 539414 or email your request to complaintsandfeedback@lancashire.gov.uk

Section One: Summary and Overview of all Social Care Complaints and Feedback

1.1 Executive Summary

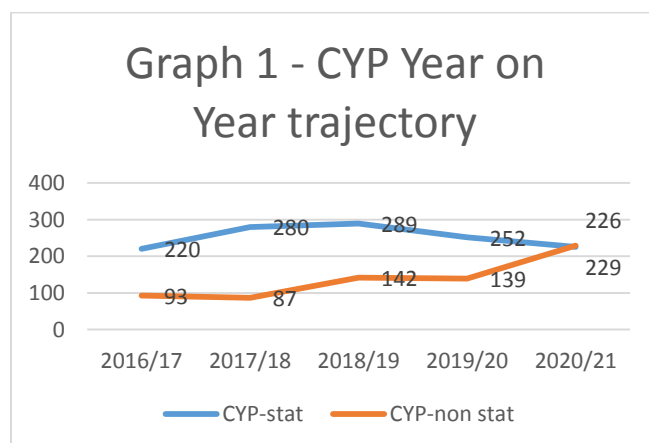
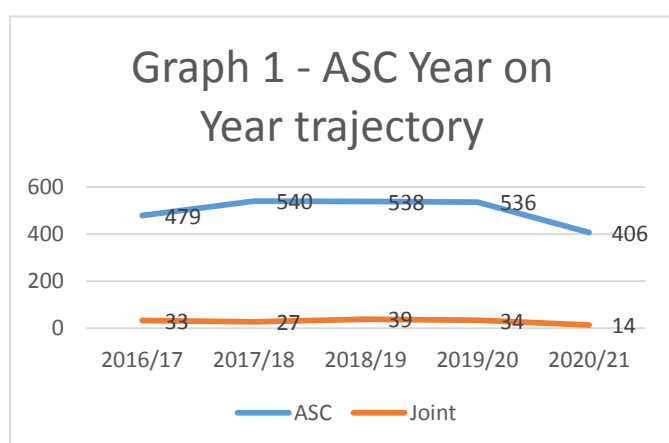
Complaints are used by the council as an opportunity to learn and improve. As a direct result of complaints in 2020/21 we have made improvements to processes and procedures. We have improved communication with customers and their families, made changes to policy and guidance and staff and managers have attended specific training sessions.

Complaints represented just under 1% of all active adult social care and children's social care cases throughout Lancashire in 2020/21. Statutory complaint totals have decreased overall by 18% (646 in 2020/21 from 788 in 2019/20). This reduction is in line with the experience of other councils, in response to the Local Government and Social Care Ombudsman's decision, to stop taking new complaints, or progressing existing cases, for the first three months of the initial wave of the pandemic, to allow councils and providers to focus their resources where they were needed most. The impact of this pause is played out in the statistics published in this report, with the number of received and decided complaints being generally lower than in previous years.

Graph 1 below shows that there were 420 complaints about adult social care (ASC) which is a 22% decrease from 2019/20. Included in this figure were 14 complex joint complaints with the NHS. This is almost half the 2019/20 figure (34).

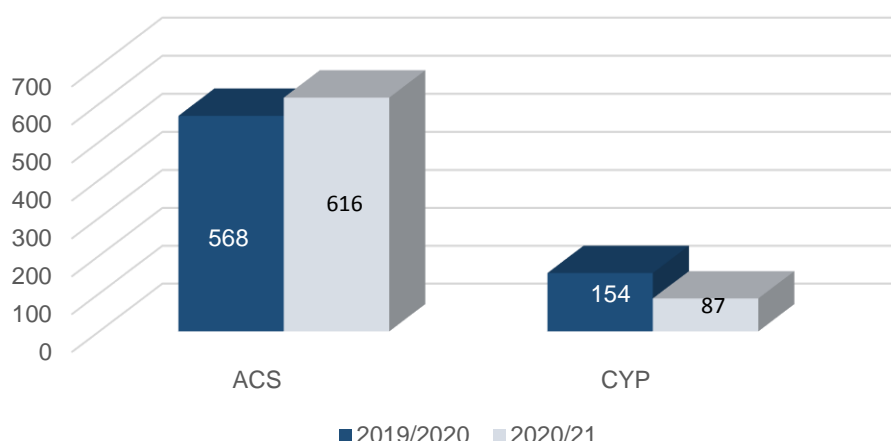
Graph 1 also shows a decrease in statutory children's social care (CSC) complaints totals by 10% (226 in 2020/21 from 252 in 2019/20). Non statutory children's complaints increased substantially from 139 in 2019/20 to 229 in 2020/21, of which 61% were Inclusion Service complaints. The probable reason for this rise is better recording as there is now an inclusion team which supports customers.

The overall numbers of statutory complaints received by the Ombudsman in relation to LCC has followed the downwards trend as they paused investigations for 3 months in 2020. These figures decreased by 30% from 142 to 99 in 2020/21.



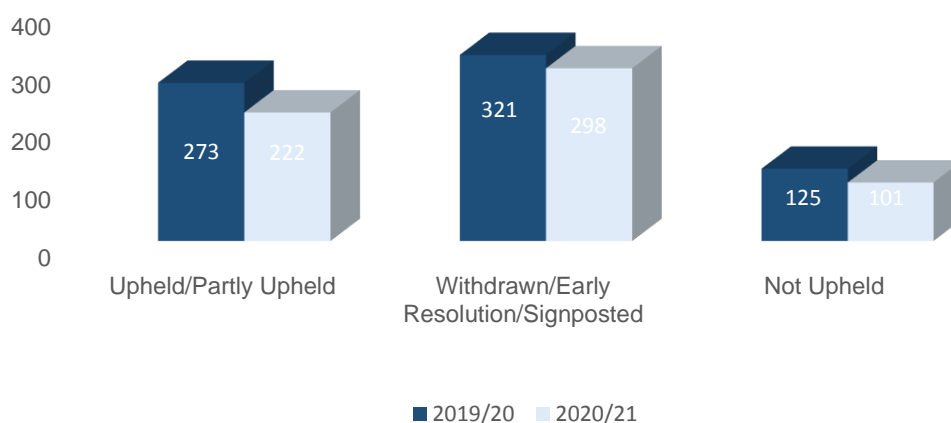
Graph 2 overleaf shows a slight decrease in **compliments** from 722 in 2019/20 to 703 in 2020/21. The totals for CYP positive feedback have decreased more dramatically, from 154 in 2019/20 to 87 in 2020/21 although they have increased for ASC.

Graph 2 - Compliments



1.2 Statutory complaint trends and outcomes

Graph 3 - Statutory Complaints by Final Outcome



The number of complaints as a percentage of total customer feedback has shown a slight reduction to 53%, compared with 57% of all feedback being complaint related in 2019/ 2020.

Graph 3 above shows a breakdown in the number of statutory complaints by final outcome for all 621 closed complaints during 2020/21. 16% of all complaints were not upheld in 2020/21 and this is the same proportion as those not upheld in 2019/20. Over a third (36% of complaints) were justified by being upheld or partly upheld. Around half (48%) of complaints have also been resolved or withdrawn at an early stage in the complaints process. This figure has increased from 40% in 19/20 and is thought to link to an extra administrative post in the complaints team, supporting early resolution in operational services.

In 2020/21 the total amount spent on investigations for statutory adult social care complaints was nil because all complaints in ASC were investigated internally and for children's social care it was £7297.03 which is an increase of over £2000 from the previous year due to the complexity of some investigations.

1.3 Local Government and Social Care Ombudsman complaints received. (The Ombudsman)

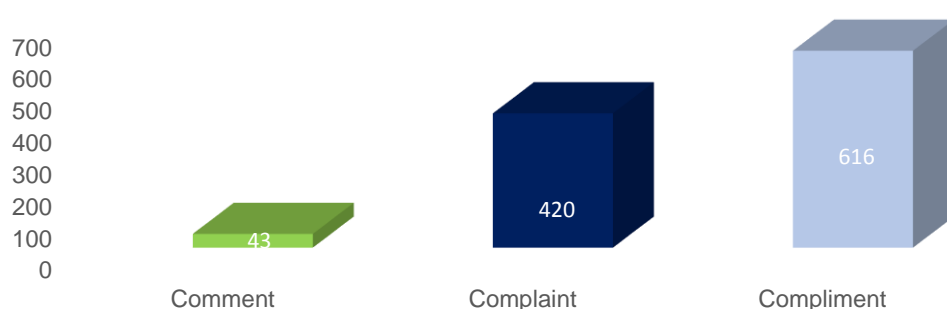
99 Ombudsman social care / education final decisions were received during 2020/21. This is a 30% reduction on the 142 Ombudsman social care and education final decisions which were received during 2019/20. This links to a pause in Ombudsman investigations from March to June 2020 due to the Covid19 pandemic. The amounts paid in social care local settlements as a result of these decisions added up to a total of £19,700. This is less than half the amount paid out in 2019/2020.

Section Two: Adult Social Care Feedback

2.1 Summary of ASC feedback

Graph 4 shows a breakdown of ASC by feedback type. A total of 420 complaints were received in 2020/21 which is a 22% decrease from the previous financial year (536). It should be noted that people are more likely to compliment adult social care rather than to complain. Compliments increased by 8% from 568 in 2019/20 to 616 in 2020/21. Comments reduced from 85 in 2019/20 to 43 in 2020/21.

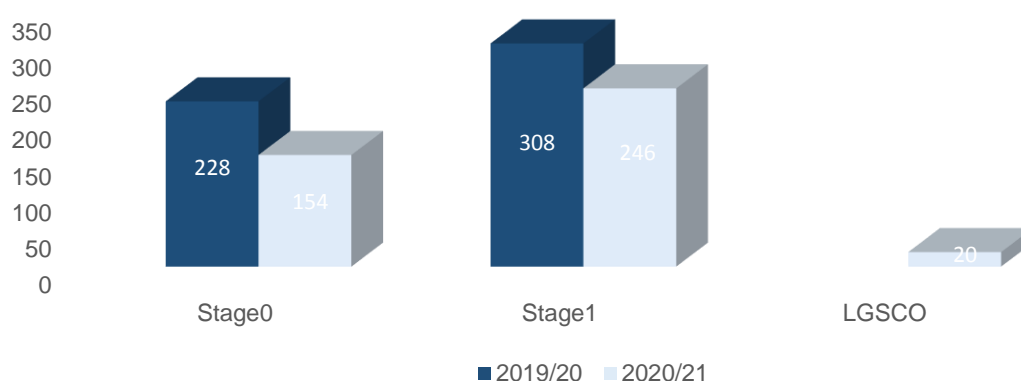
Graph 4 - Feedback Type



2.2 Breakdown of complaints by stage

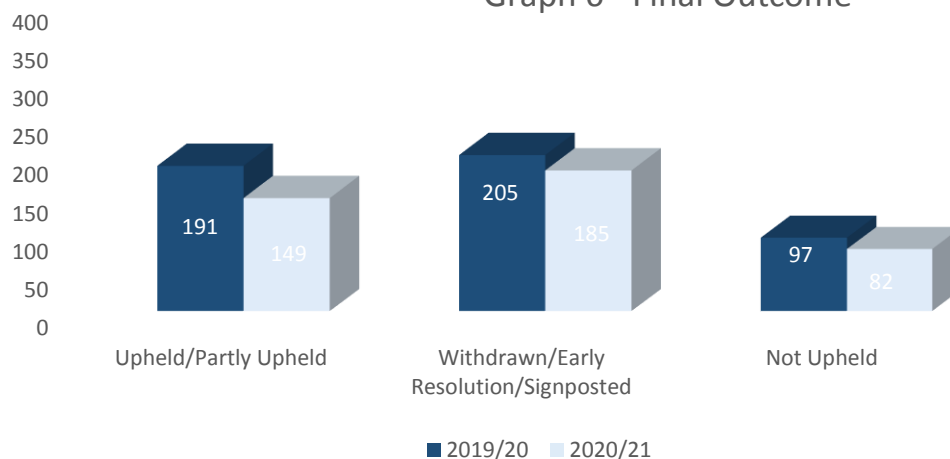
The breakdown of ASC complaints is shown in Graph 5. Stage 0 is the early resolution of complaints, so a significant proportion of complaints (38%) continue to be resolved at the first point of contact with council officers. Most complaints (59%) are resolved locally after further escalation, and a further 5% are resolved by an ombudsman investigation.

Graph 5 - Complaint resolution stage



The outcomes of 416 closed complaints that commenced in this financial year, and had outcomes recorded against them at the year-end, are shown in Graph 6. Of all closed complaints, 185 were either withdrawn or resolved early, 149 had at least one aspect upheld and only 82 were not upheld. These are similar proportions to the figures for 2019/20.

Graph 6 - Final Outcome



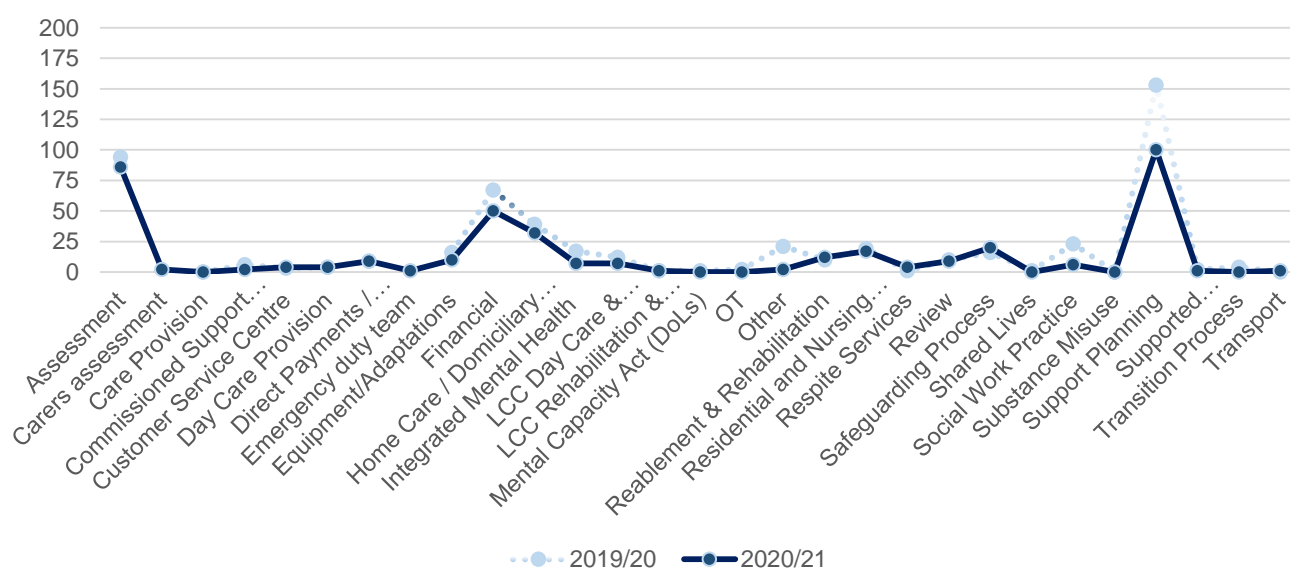
A total of 243 internal complaint investigations were undertaken. The breakdown of these was 57% upheld/partly upheld (139), 11% withdrawn/early resolution/signposted (26) and 32% not upheld (78). So, the upheld and partly upheld figures show that in 57% of all cases, when an investigation is undertaken, an aspect is found to be justified. In 2019/20 this figure was 60%.

70 complaints exceeded the statutory timescales of 6 months (29%). The main reason for this increase, identified by a recent staff survey, is social work staff capacity and the 3 months pause in complaints because of the pandemic, early in the financial year.

2.3 What do people complain about?

Graph 7 shows complaints by service type for the last 2 financial years.

Graph 7 - Complaints By Service Type



For 2019/20, the most frequent subject of complaint was Support Planning (153) which received 29% of the total number of complaints. For 2020/21, this dropped to 100, which is 24% of the total number of complaints. The reason for this is probably due to less support planning activity as a direct result of the first lockdown, when many older people did not wish to enter residential care or receive homecare services. Also, the current academy training for new social workers, and complaints training emphasises the importance of social workers taking ownership and dealing with issues immediately, to stop complaints escalating.

2.4 Learning for adult social care

Although managers address complaints received with their staff, the learning is not always widely known and there is a risk that other mistakes with similar themes, continue to occur. To remedy this and give feedback from customers the priority that it deserves, a Shared Learning Panel has recently been created, chaired by the Principal Social Worker in order to identify the themes and root causes of complaints and to cascade learning across the council.

The main learning for 2020/2021 is outlined on the next few pages.

Area	Learning point for adult social care
Social Care and Support Planning	<p>In two complaints by relatives stating that they did not know about the costs of care, managers have worked with staff to ensure that the relevant 'financial implications' document is always provided. Staff now allow time for people to read and understand it, before it is signed. Staff document such discussions, which always needs to include any backdating of charges.</p> <p>In a complaint where the person did not know about the support offered by the Lancashire Independent Living Service (LILS), managers worked with LCC and LILS staff, to reduce barriers and ensure that people feel confident to approach them to arrange a personal assistant.</p> <p>In a complaint about the lack of support offered by our transitions service, managers held a team meeting to discuss the prioritisation and allocation of cases and staff were made aware of how the lack of support during transition to adult services can impact young people and families.</p> <p>In several complaints which highlighted the inexperience of newly qualified social work practitioners, they have now been given extra support during their first year of employment through supervision and training. This includes reflective practice and discussion about ongoing professional development.</p> <p>In other complaints specific to social work practice, managers took the following action with the individual workers concerned:</p> <ul style="list-style-type: none"> • Reminding the worker at supervision of the importance of being familiar with the recent case history before contacting the service user or their family. • Giving the worker the link to the council's complaints procedure webpages and attendance at complaints training, to ensure that

	<p>they understand the part they play in complaints resolution.</p> <ul style="list-style-type: none"> • Auditing information contained within support plans and case notes, to ensure this is accurate and it includes any changes in care provided. • Introducing regular reviews of assessments and tasks to ensure that the correct priorities are given to each case.
Complaints about communication	<p>In several complaints about staff not returning calls or sharing information in good time, managers reminded social workers at supervision of the importance of returning calls to service users and/ or their families in a timely manner.</p> <p>In several complaints about not discussing all care options, managers reminded social workers of the importance of discussing all care options at the point of review with service users and/or their representatives.</p> <p>In a few complaints about errors in the recording case notes, we rectified the information and added customer comments to the entries.</p> <p>In a few complaints about the content of emails shared with customers, containing unprofessional dialogue between internal departments in the threads, a staff notice has been shared and training has been improved.</p> <p>In a complaint about reablement, managers have set up regular meetings to improve communication between services and providers, across the county, to deliver an effective and quality reablement service.</p>
Personal Budgets	<p>In a complaint about an invoice saying that a relative had misused her daughter's direct payments and payment was due, we have reviewed the direct payment guidance and trained staff on the updated information, to ensure professional communication is always maintained.</p>
Reablement	<p>In three complaints about reablement plans and care providers, involving time of visits being inconsistent, care not being delivered, ineffective communication and allocated workers changing, we have:</p> <ul style="list-style-type: none"> • Identified areas for improvement with providers and worked with them to ensure that improvements are implemented and sustained. • Included more detail to show evidence of improvement in reablement plans • Ensured that allocated workers remain as consistent as possible during a period of reablement. • Discussed with staff the inappropriate use of language and making unsubstantiated statements around the issue of 'capacity'. • Worked with specific staff to ensure that conversations and decisions are recorded accurately after the event, fully involving

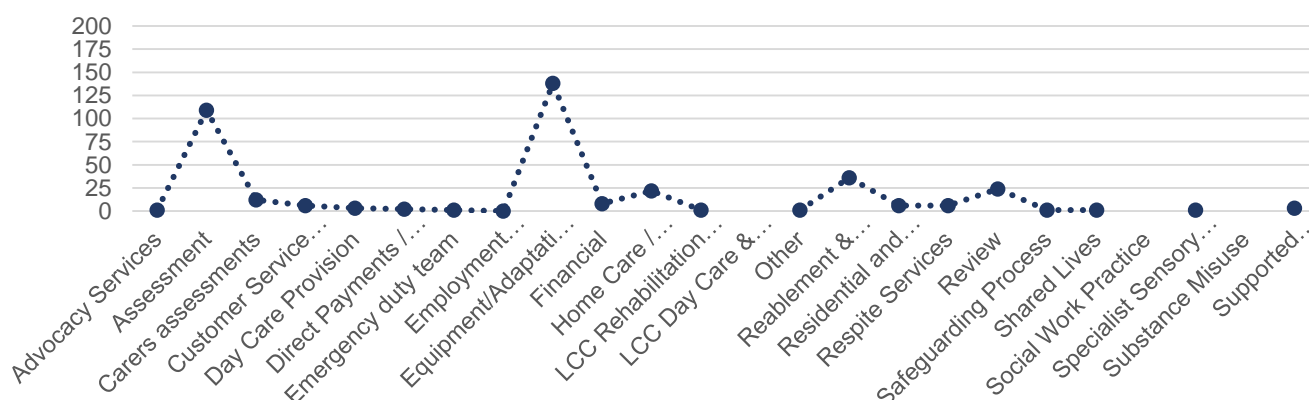
	<p>the family or representative in reviewing decisions when appropriate.</p> <ul style="list-style-type: none"> • Worked with a provider to ensure that their flexibility of service does not compromise individual care and reablement needs.
--	---

2.5 ASC services which were the subject of compliments

Graph 8 shows the number of compliments received by service type for 2020/21 recorded on the Customer Feedback System (CFS) which was 469 in total. Unfortunately, the further 147 compliments captured via other methods cannot be broken down into the same categories to allow an overall breakdown of the 616 compliments.

The number of compliments has increased by 48 from 568 in 2019/20 to 616 in 2020/21. In 2019/20, 32% of all compliments were because of equipment and adaptations received and this has decreased slightly to 29% in 2020/21. This remains the most frequent reason for a compliment followed by Assessment. Compliments for both the safeguarding process and Rehabilitation & Reablement have both decreased for 2020/21.

Graph 8 - Compliments By Service Type



2.6 Joint Complaints

A Joint Complaints Protocol is in place with the NHS. Complaints investigations increasingly involve many different parts of the council as well as health services and contracted service providers therefore adding much more complexity which the complaints team coordinates.

There was a decrease in closed joint complaints during 2020/21 to 14 compared with 31 in 2019/2020. These complaints are sometimes complex and take longer to resolve as they involve ASC and the NHS, typically Hospital Trusts and/or Clinical Commissioning Groups. A further 10 joint complaints were still open at the close of 2020/21. Of the closed complaints 1 was not upheld and 13 were partly upheld. Support Planning and Social Work Practice were the biggest themes.

2.7 Ombudsman Complaints

The Local Government and Social Care Ombudsman provides the final stage for complaints about local authorities and some other organisations providing local public services. Their service is provided free of charge. Complainants approach the Ombudsman when all other options for pursuing their complaint

are closed by the council, after it is considered that a proportionate response has already been provided. The Ombudsman will only consider complaints that have already been through the council's complaints procedures, although sometimes an early referral will be made to the LGSCO when complainants continue to be dissatisfied and the council considers that it has not done anything wrong or it has done all it can to resolve the matter.

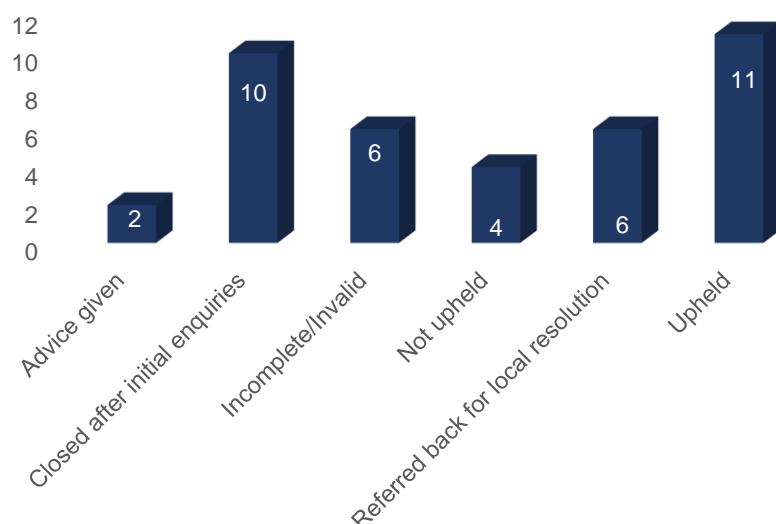
In 2020/21, the Ombudsman received total of 44 separate enquiries in relation to ASC in Lancashire (in 2019/20 it was 62). A total of 39 decisions were made by the Ombudsman in 2020/21 for ASC.

Graph 9 below shows of the 39 Ombudsman ASC decisions received in 2020/21, 10% were not upheld, 62% were not investigated and 28% were upheld.

It should be noted that the Ombudsman will also uphold complaints that the council has already upheld. Of the 11 complaints that were either upheld or partly upheld, 6 were not upheld by ASC originally, **making an actual uphold rate of 15% when all 39 decisions for the year are considered.**

The final decisions resulted in a total of £17850.00 being paid out by the council.

Graph 9 - Final Outcome



There have not been any ASC public reports in 2020/21.

The main learning from the 11 upheld complaints is outlined below.

2.8 Ombudsman identified learning for adult social care complaints

Managers have issued guidance to staff about ensuring clarity regarding the basis of care provision being arranged.

Managers have reminded staff that when there is a change of care provider, the new provider is made fully aware of the person's needs, including any previous input from health services such as speech and language therapy.

The council has reviewed arrangements with our provider of carers assessments, to ensure their staff are aware of when to refer cases to ASC for further consideration.

The council has reviewed our processes for matching addresses across service records.

Managers have reminded staff of our policy on sending questions in advance of telephone assessments and the need to check whether service users need reasonable adjustments to be made to council processes. We have also provided training to staff on our obligations under the Equality Act.

The contracts team has reminded a contracted provider that homecare staff must properly record their arrival and departure from visits and that staff need to be reminded of their complaint policy. In addition, a council a monitoring visit will check that all records are kept securely in line with policy / relevant legislation and guidance.

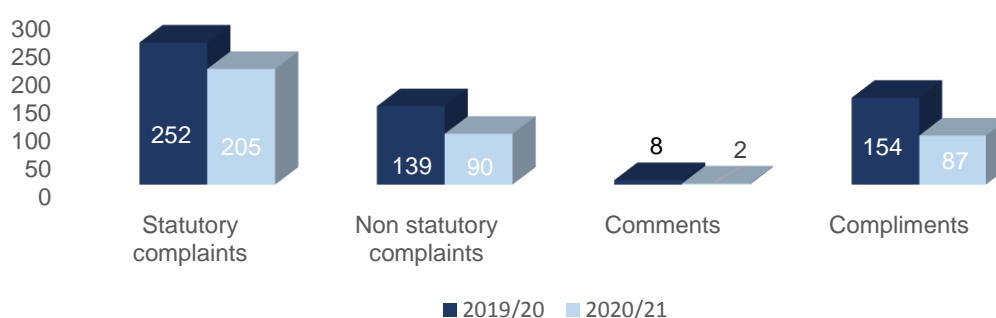
Section Three: Children and Young People Feedback

3.1 Summary of CYP and CSC feedback

There is a statutory and non-statutory process for complaints about CYP services. The statutory process involves three stages for social care complainants, who are eligible to complain. The Stage 1 initial response is always compiled by the service manager involved. If the person complaining is still unhappy, they can request a Stage 2 independent investigation. If the complainant remains unhappy, a Stage 3 review panel, which considers the way the stage 2 was investigated, can be requested. The non-statutory process applies to non-social care complaints (for example education or Special Educational Needs and Disabilities SEND) or for people complaining about CSC who do not have parental responsibility for a child (for example grandparents). In 2019/20 the total amount spent on investigations for children's complaints was £7297.03.

Graph 10 shows a decrease in CSC statutory complaints, comments and compliments. Complaints specifically decreased by just over 18%, to make an overall total of 205 for 2020/21 probably due to the pausing of complaints due to the pandemic. Most CSC complaints are made by parents or guardians. Only 30 complaints were made by children in 2020/21. Complaints made by children are prioritised for immediate attention and advocates are provided to help give children a voice.

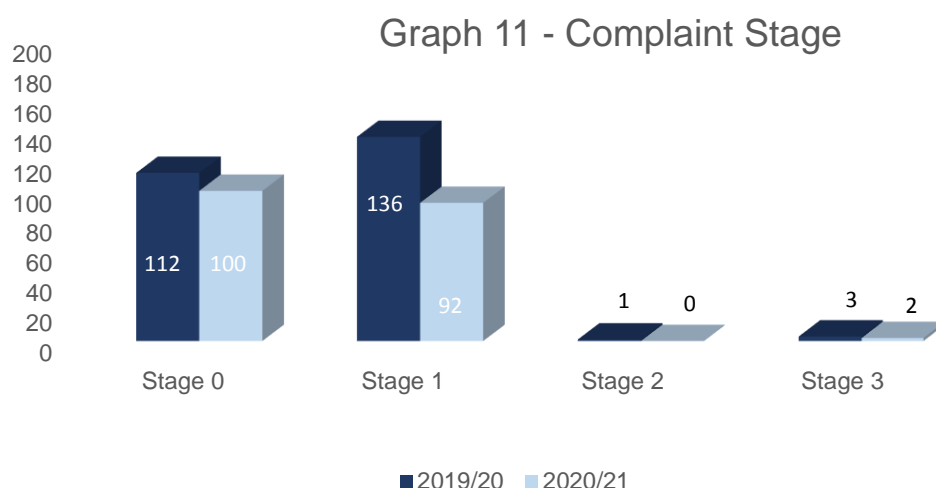
Graph 10 - Feedback Type



3.2 Breakdown of complaints by stage

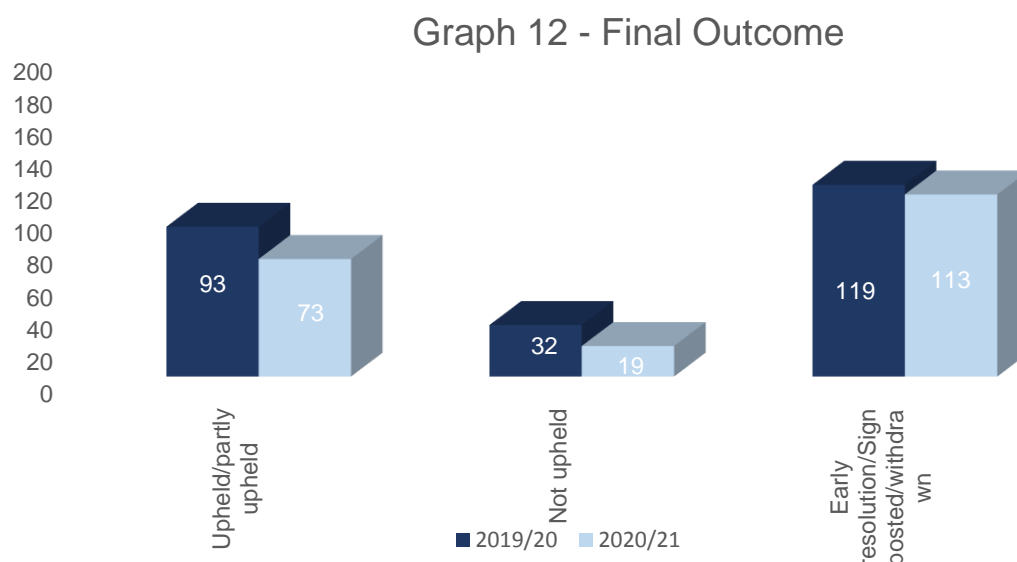
The breakdown of complaints with outcomes recorded against them can be seen in Graph 11. Stage 0 is the early resolution of complaints.

Although the number of complaints resolved locally at an early stage has slightly reduced, the proportion being resolved early in the complaint journey (52%) is higher than in 2019/20 (45%), which is welcome news. Less complaints escalated to Stage 1 than in 2019/20. No complaints were resolved by the two Stage 2 independent investigations which were commissioned, and two Stage 3 panel hearings were therefore also held.



3.3 Breakdown of complaints by outcome

Graph 12 shows a breakdown of the 205 closed statutory complaints which had a final outcome recorded at the time of writing this report. Of these 9% were not upheld, 36% were upheld or partly upheld and most complaints (55%) were signposted, resolved early or withdrawn (a similar proportion for the last two financial years). Local and early resolution of complaints is a better outcome for everyone, as escalation is time-consuming and expensive.

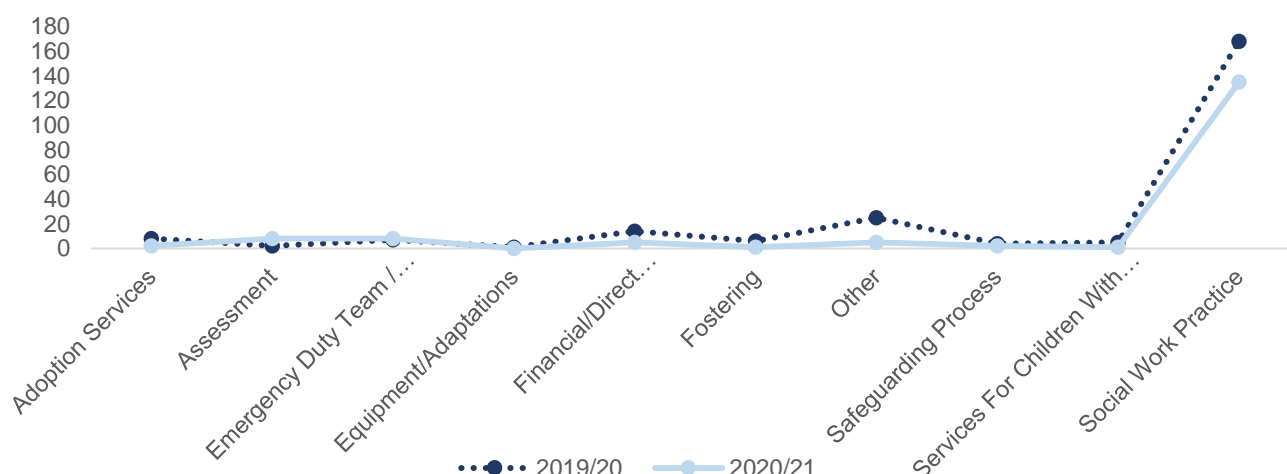


Of the total number of statutory CSC complaints received in this financial year, 68% (140) exceeded the statutory timescale (20 working days). Last year this was a rate of 61%. The main reason for this increase, identified by a recent staff survey, is social work staff capacity and the 3 months pause in complaints because of the pandemic, early in the financial year. Recent changes to social care roles have also impacted on resolution timeframes.

3.4 What do people complain about in the statutory process?

Graph 13 below shows a breakdown by service type for the last 2 financial years. The proportions are similar and social work practice continues to be the most frequent subject of complaint covering 66% of all statutory CYP complaints.

Graph 13 - Complaints By Service Type



3.5 Learning

Area	Internal learning point for children's services
Improving relationships with families	<p>Four complaints focussed on improving the way social workers interact with families.</p> <ul style="list-style-type: none"> In one case the social worker improved their working relationship with the family by increasing contact. In another number of cases, social workers have reflected on complaints findings with their managers in supervision settings, to shape their approach to customers, by considering what they would say and how to conduct themselves more sensitively in the future.
Reflection, training and improvements to social care provision	<p>Many complaints identified learning and development and training needs for the workers involved. Managers discuss complaint outcomes in supervision with the worker for reflection and improvement and share with the wider team when relevant, to improve practice moving forward. Some complaints have been anonymised and used as an example for staff training.</p> <ul style="list-style-type: none"> Some staff members have attended training regarding information sharing and accuracy principles Learning & development sessions now take place with all social workers as part of their weekly briefing sessions with managers. At the session the importance of working in partnership with parents is emphasised and good practice examples are shared around communication.

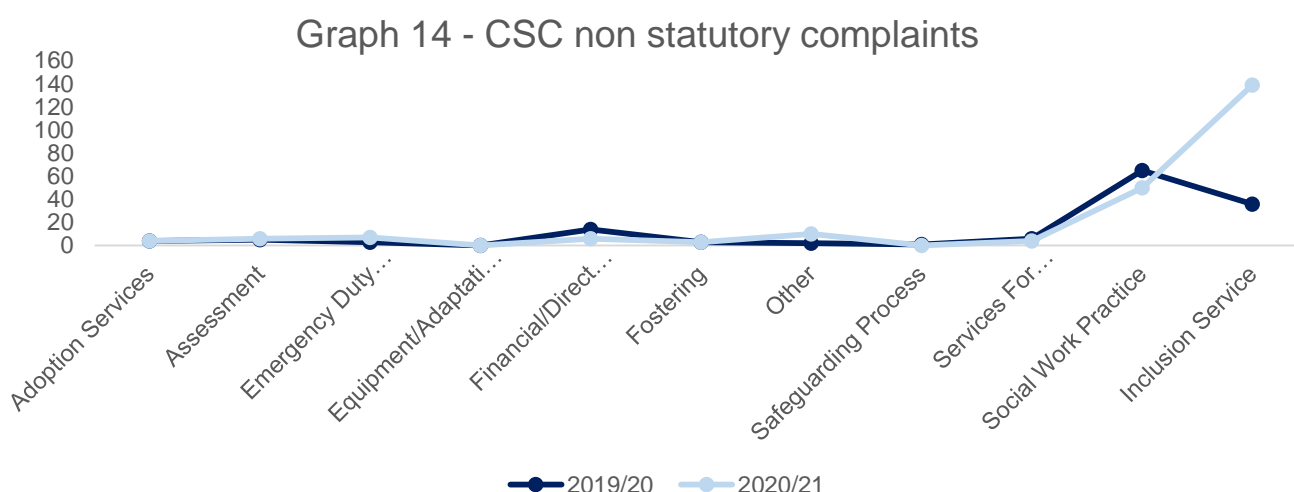
Communication	<p>Many complaints specially highlighted poor communication from workers with other professionals, families and sometimes their support networks.</p> <ul style="list-style-type: none"> • In a complaint highlighting a lack of communication between childcare teams, managers devised a process to prevent similar reoccurrences. In another, highlighting a lack of communication between social workers email correspondence protocols were set up to share decisions. A complaint was used as an example in training, focussing on how communication could have been improved. • In another case a senior manager worked with the social worker and practice manager to improve their communication with families. In another, the assessment planning process was specifically discussed to consider how communication between workers and families could be improved. • In another situation, it was agreed that when the social worker cannot get hold of the complainant, a phone call will be followed by a text, so the complainant is aware that CSC services are trying to get hold of her.
Reviewing and improving processes, policies and procedures	<ul style="list-style-type: none"> • As a result of one complaint it is now common practice for parents/carers to be written to when council payments are planned to cease. • The process for inputting birth notifications has been reviewed and amended to prevent the same mistake highlighted by the complaint from happening again. • The Family Time Team have now amended their policy in relation to contacting families regarding changes to plans. • The procedures regarding placement freezes have been reviewed and discussed with the relevant workers to increase their understanding of the reasons to adhere to them in future. • One complaint resulted in all workers who are in contact with families to be reminded to take the appropriate precautions in relation to Covid-19 and PPE • In one social care team, an improved and more robust tracking system was put into place to ensure Child Protection documentation is completed in a timely manner. This improvement is already leading to improved timeliness of recordings.
Fostering Services	<p>Following a complaint highlighting a poor placement decision, all teams were asked to improve their engagement with children when visiting and attending homes during the matching process, taking special care when foster carers are new to the role. Reflective discussions took place with line managers, considering the learning.</p>

Residential Services	One complaint outcome resulted in the matter being fully investigated by an independent officer within the care agency & with the Local Authority Designated Officer. Recommendations were made and implemented.
-----------------------------	--

3.6 Summary of non-statutory CSC complaints

Non CSC statutory complaints are made by a people who are **not** entitled to complain under the Children Act procedures (for example a family friend or a relative without parental responsibility) or if the complaint is about something that cannot be complained about under the Children Act (for example adoption or fostering matters/complaints by members of the public: please see further categories below). Complaints about the Inclusion Service are also non-statutory, if CSC is not involved.

3.7 What are CSC non-statutory complaints about?



Graph 14 above shows that non statutory complaints have increased overall, but particularly for the Inclusion Service (36 in 2019/20 to 139 in 2020/21). As highlighted earlier in this report, this may be due to better reporting.

Identifying themes and learning from all complaints is essential. Senior managers are informed of the themes on a regular basis through quarterly reporting and regular attendance at team meetings or senior management meetings.

3.8 Services which were the subject of compliments and comments

Due to the nature of CSC, not many compliments are received (51). With the addition of compliments for the Inclusion Service, a total of 87 compliments were received for 2020/21, which is a decrease of 44%, from 154 for the previous year.

3.9 Ombudsman Complaints

The Local Government and Social Care Ombudsman acts as the regulator and provides the final stage for

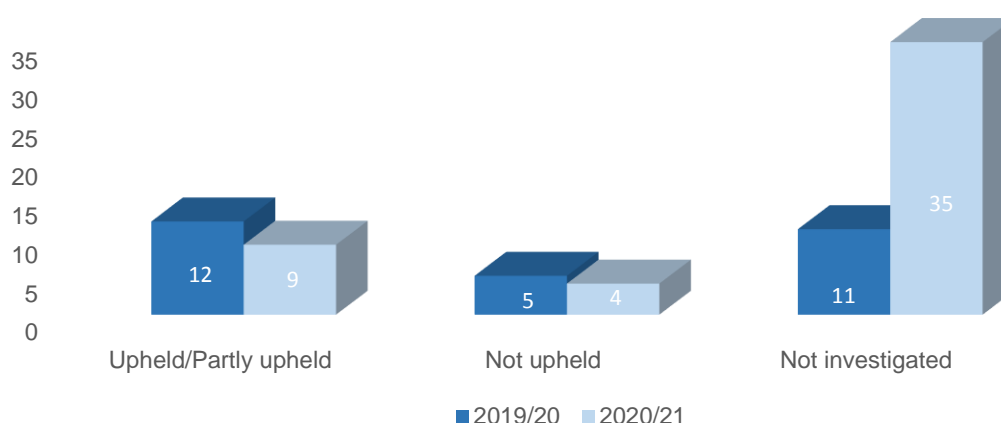
complaints about local authorities and some other organisations providing local public services. Their service is provided free of charge. Complainants approach the Ombudsman when all other options for pursuing their complaint are closed, after a proportionate response has been provided. The Ombudsman will only consider complaints that have already been through the council complaints procedures. Sometimes the council will make early referrals to the Ombudsman when complainants continue to be dissatisfied and the council considers that it has not done anything wrong or it has done all it can to resolve the matter.

In 2020/21, the Ombudsman received total of 55 separate enquiries in relation to CSC, Inclusion and Education Services in Lancashire (in 2019/20 it was 74). Of these, a total of 48 decisions were made by the Ombudsman in 2020/21 for CSC.

Graph 15 below shows of the 48 Ombudsman CSC decisions received in 2020/21, 56% were either not upheld or closed after initial enquiries. The number of enquiries referred back to the council for local resolution represent 25%. Only 19% of decisions were upheld.

As the Ombudsman will also uphold complaints that the council has already upheld and of the 9 complaints, 4 had already been upheld or partly upheld, **this makes an actual uphold rate of 10% for the 48 decisions made.** A total of £1850.00 was paid out in final decisions for 2020/21. For 2019/20, this was a total of £33,709.36 (mainly due to the remedy in one complaint).

Graph 15 - Final Outcome



3.10 Ombudsman identified learning for Children's Complaints

The identified learning from the upheld social care and education complaints is as follows:

Managers have reviewed council procedures and duties under Section 19 of the Education Act 1996 to ensure compliance with the law. Staff have been reminded of those duties, including the need to chase responses from professionals who do not respond within the statutory timescales for Education, Health and Care Plans.

Managers have issued guidance to relevant staff to ensure they understand that it is important to take a holistic approach to complaints which span different council services. Managers have provided guidance, and additional training, to staff about when and how to use the statutory complaint procedure for Children's Services complaints. We have also reviewed our complaints procedure and training to ensure the above two points are clear for all staff.

Managers have reminded staff of our power to provide funding support when a child is not on a school roll, and the need to document decision-making to evidence the exercise of discretion where appropriate.

We have improved our Covid19 temporary school appeals process to ensure that we clearly document the reasons taken by panel members for holding a panel in a certain way (e.g. written and not verbal). Further training and oversight has been offered to a casual clerk to ensure clear recording of who was present during the panel's consideration of appeals and that this is set out in the decision letter.