

Audit and Governance Committee

27 April 2026

Corporate Complaints Policy

For Decision

Cabinet Member:

Cllr R Hope, Customer, Culture and Community Engagement

Local Councillor(s): N/A

Senior Leadership Team:

J Mair, Director of Legal & Democratic

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Statutory Authority:

Report status: Public (the exemption paragraph is N/A)

1. Executive summary

- 1.1 The Council maintains a number of complaints policies: statutory documents for [Children's Social Care](#) and [Adults Social Care](#), a [Whole Authority Complaints policy](#) for non-social care matters, alongside a [Councillor Code of Conduct complaints](#) policy and also the [Dorset Police and Crime Panel protocol](#). In addition, the Council operates a [Managing Customer Behaviours protocol](#), to establish mechanisms for managing vexatious, aggressive and potentially violent contacts.
- 1.2 Complaint numbers nationally have shown a significant increase. For Dorset Council cases have increased year on year since 2019 (with one exception). The use of artificial intelligence has impacted on both complaint numbers and complexity. On one hand this presents a positive tool for those members of the public that may have found it difficult to articulate a complaint to ensure that their voice is heard. Equally however where contact could be considered excessive and on occasions vexatious, it can be onerous on the complaints team and Directorate staff. The thrust of the complaint can also be lost in what can be very detailed AI generated content, quoting legislation and process. AI generated advice suggests email submission which bypasses the

Council's eform, which has been designed to support framing of the complaint process and remove staff time in data entry.

- 1.3 The policy frameworks remain largely fit for purpose, having been subject to approval by Audit and Governance Committee in January 2025. However, it is proposed to add some additional measures to better manage AI generated content, by limiting non-statutory complaints submission to the Council's e-form and to reserve the right to summarise long complaints into a more digestible format.
- 1.4 Some other minor changes are proposed to the Managing Customers Behaviour protocol, as referenced in the more detailed report.

2. **Recommendation(s)**

- 2.1 That the Audit and Governance Committee approve the proposed changes to the complaints policy frameworks:
 - Restricting submission of complaints to e-form only (other than for social care complaints);
 - Removing reference to the complaints email address from policy documents;
 - Reserving the right to summarise and only respond to key points of long AI generated correspondence;
 - Adding a target review timescale to the Managing Customers Behaviour protocol;
 - Reserving the right of the Unreasonable Behaviours Panel to make decisions from virtual circulation of evidence.

3. **Reason for the recommendation(s)**

- 3.1 To enable complaints to be managed efficiently and effectively whilst protecting staff wellbeing.

4. **The Detail**

- 4.1 Local authorities have generally experienced an increase in complaint numbers. The Dorset Council annual reporting to scrutiny committees recognised that complaint numbers for 2024/25 were up 17% from the previous financial year and the highest number in the Council's history, at 1919. The year on year increase can be seen in the chart below:

2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
722	1,268	1,406	1,838	1,588	1,919	2,406

- 4.2 The 2025/26 year has seen complaint numbers increase by 25.38% since the previous financial year, and 233% since Dorset Council came into being.
- 4.3 The reporting to scrutiny sets out that the number of cases escalated to the Local Government and Social Care Ombudsman (LGSCO) remains low at approx. 7% (151 in 2024/25). Of these, 85% were upheld – a figure broadly consistent with other organisations. However, this small number of escalations does indicate that in the majority of cases the Council sufficiently responds to complaints.
- 4.4 There may be a number of factors that are influencing the increase in complaints. However one thing that is for certain is that the public's increasing use of artificial intelligence is having an impact. Firstly, the AI generated summaries used by popular internet search tools is bypassing the public away from our e-form to the complaints email address. As a result, complaints have to be interpreted and manually input to the database, rather than the fields guiding the complainant completion and auto populating our system. Secondly, AI generated complaints are generally very long, will quote case law, policy and process that is on occasion inaccurate and establish a significant number of lines of investigation that need to be followed up by the complaints team and Directorate staff.
- 4.5 In response, it is proposed to make a number of additions to the complaints policies. The policies have not been added as appendices due to length, but are hyperlinked for reference where necessary. The aim is however to apply these changes to each of the complaints policies, unless there is a legal reason that we are unable to.
- 4.6 Firstly, the policy will set out that, where complaints are lengthy and believed to be AI generated, the Council reserves the right to summarise the complaint and respond solely to the key points. This approach follows verbal guidance set out recently by the LGSCO, who is also experiencing increasing caseloads through AI generated content. The rights of the complainant to escalate to the LGSCO if they are dissatisfied with the Council's response remains. The following wording is recommended (based on the Whole Authority policy):

“The Council recognises that members of the public may choose to use Artificial Intelligence (AI) tools to assist in drafting

correspondence or complaints. While we do not restrict the use of such tools, all submissions must remain:

- Accurate,
- Relevant to the matter being raised, and
- Proportionate in length.

Where a lengthy AI generated complaint has been submitted, the Council reserves the right to:

- Greatly summarise unnecessarily lengthy or repetitive complaints and respond only to the substantive issues raised;
- Issue brief position statements rather than detailed responses if the complaint includes excessive or irrelevant commentary.

Where correspondence appears to have been generated using AI in a way that produces excessive volume, repetitive material, or content that does not relate meaningfully to the issue, the Council may apply its unreasonable behaviour provisions.”

- 4.7 The policies will set out that only complaints received via the e-form will be considered. Any submitted via email will receive an acknowledgement referring the complainant to the online form. To ensure that those unable to use the e-form are not disadvantaged, complainants will have the option to telephone the complaints team. It should be noted this change cannot be applied to either the statutory Childrens or Adults Social Care complaints policies, which are required to enable multiple mechanisms for submission. The following wording is recommended:

“You should submit your complaint via our online form at www.dorsetcouncil.gov.uk [Complain to Dorset Council - Dorset Council](#) . Complaints will not be accepted by email. If we receive an email complaint, we will not accept it and instead will respond signposting you to these pages. This allows us to process your complaint more efficiently. If there are any reasons why you are unable to submit your complaint online, you should contact the complaints team on 01305 221061 so that any alternative arrangements can be made.”

- 4.8 The complaints email address will be removed from all policy documentation, to prevent it being referenced in AI generated advice to the public, over time.
- 4.9 Dorset Council hosts the Dorset Police and Crime Panel on behalf of both unitary authorities. It has its own complaints process, but its application

mirrors the Council's own arrangements, where able to. The Complaints Sub Committee meeting on 6 February 2026 agreed to replicate these approaches, if they are approved by Audit and Governance Committee.

4.10 A number of minor changes are also proposed to the Managing Customer Behaviours Protocols, based on comments fed back by the Deputy Monitoring Officer when reviewing appeals to decisions:

- The review of panel decisions should set out a timeline of 20 working days for the reviewing officer to seek to communicate an outcome. This is consistent for the timescales set out in the complaints policy.
- Section four of the protocol will be updated to enable a decision to be made virtually via circulation of appropriate documents, for straightforward cases, at the discretion of the Chair. However any panel member will have the right to request a full meeting where they believe this to be necessary.

4.11 In summary, this change is not about restricting the use of AI, but about addressing the practical difficulties created by long, unfocused email submissions—whether drafted manually or using AI tools. Unlike emails—which can vary significantly in format, contain excessive or irrelevant material, and require staff to manually interpret and re-enter information—the e-form provides a structured route that ensures all required information is captured at the outset, supports quicker triage, and reduces avoidable administrative burden. This adjustment aims to manage the operational impact of increasingly lengthy submissions and to maintain clarity in the complaints process, without limiting how individuals choose to prepare their complaint.

5. **Alternative options considered**

5.1 The alternate option considered was to retain existing policy wordings. However, to maintain standards of complaint handling and reduce the risk of increased escalations to the LGSCO, this would likely result in the need for additional resourcing across the corporate complaints function and those service areas that by their very nature generate significant customer contact.

6. **Legal considerations**

6.1 The statutory complaints processes for Childrens and Adults social care must enable customer contact via a range of mechanisms. Limiting contact to e-form only is therefore not practical. A further legal consideration is that current caseload and complexity is not sustainable without the proposed interventions, and therefore increases the risk of escalations to the LGSCO.

7. Financial implications

7.1 None

8. Natural environment, climate & ecology implications

8.1 None

9. Well-being and health implications

9.1 This proposed change to policy is intended to support staff currently carrying high caseloads. The Managing Unreasonable Customer Behaviour protocol is designed to protect Council workers against the negative effect of vexatious, aggressive or violent behaviour.

10. Other implications

10.1 None

11. Risk implications

11.1 HAVING CONSIDERED: the risks associated with this decision; the level of risk has been identified as:

Current Risk: Low

Residual Risk:Low

12. Equalities

12.1 An Equality Impact Assessment was completed. It was recognised that the restricting complaints submission to e-form only may negatively impact on some protected characteristics. The option therefore remains to contact the complaints team by telephone to support submission.

13. Appendices

13.1 None

14. Background papers

14.1 [Report to Audit and Governance Committee 13 January 2025](#)

Complaints policies / protocols for:

[Childrens Social Care](#)

[Adults Social Care](#)

[Whole Authority](#)

[Councillor Code of Conduct](#)

Dorset Police and Crime Panel

Managing Customer Behaviour

15. Report sign-off

- 15.1 This report has been through the internal report clearance process and has been signed off by the Director for Legal and Democratic (Monitoring Officer), the Executive Director for Corporate Development (Section 151 Officer) and the appropriate Portfolio Holder(s)