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Bill Cullen MBA (ISM), BA(Hons) MRTPI Chief Executive

Date: 02 October 2023



To: Members of the Ethical Governance and Personnel Committee

Cllr A Pendlebury (Chair)

Cllr MJ Crooks

Cllr WJ Crooks

Cllr CM Allen

Cllr KWP Lynch

Cllr MB Cartwright

Cllr LJP O'Shea

CIIr MA Cook

Copy to all other Members of the Council

(other recipients for information)

Dear member,

There will be a meeting of the **ETHICAL GOVERNANCE AND PERSONNEL COMMITTEE** in the De Montfort Suite, Hinckley Hub on **TUESDAY**, **10 OCTOBER 2023** at **6.30 pm** and your attendance is required.

The agenda for the meeting is set out overleaf.

Yours sincerely

Rebecca Owen

Democratic Services Manager

Fire Evacuation Procedures

- On hearing the fire alarm, leave the building at once quickly and calmly by the nearest escape route (indicated by green signs).
- There are two escape routes from the Council Chamber at the side and rear.
 Leave via the door closest to you.
- Proceed to Willowbank Road car park, accessed from Rugby Road then Willowbank Road.
- Do not use the lifts.
- Do not stop to collect belongings.

Recording of meetings

At HBBC we are open and transparent about how we make decisions. We allow recording, filming and photography at all public meetings including Council, the Executive and Planning Committee as long as doing so does not disturb or disrupt the proceedings. There may occasionally be some reports that are discussed in private session where legislation requires this to happen, but this is infrequent.

We also allow the use of social media during meetings, which helps to bring the issues discussed to a wider audience.

Members of the public, members of the press and councillors are hereby informed that, in attending the meeting, you may be captured on film. If you have a particular problem with this, please contact us so we can discuss how we may accommodate you at the meeting.

Use of mobile phones

To minimise disturbance to others attending the meeting, please switch off your phone or other mobile device or turn it onto silent or vibrate mode.

Thank you

ETHICAL GOVERNANCE AND PERSONNEL COMMITTEE - 10 OCTOBER 2023

AGENDA

1. APOLOGIES AND SUBSTITUTIONS

2. MINUTES OF PREVIOUS MEETING (Pages 1 - 4)

To confirm the minutes of the previous meeting.

3. ADDITIONAL URGENT BUSINESS BY REASON OF SPECIAL CIRCUMSTANCES

To be advised of any additional items of business which the Chair decides by reason of special circumstances shall be taken as matters of urgency at this meeting.

4. DECLARATIONS OF INTEREST

To receive verbally from members any disclosures which they are required to make in accordance with the Council's code of conduct or in pursuance of Section 106 of the Local Government Finance Act 1992. This is in addition to the need for such disclosure to be also given when the relevant matter is reached on the agenda.

5. QUESTIONS

To hear any questions received in accordance with Council Procedure Rule 12.

6. SOCIAL MEDIA POLICY AND GUIDELINES (Pages 5 - 20)

To present the updated social media guidance and best practice for employees and councillors.

7. CORPORATE COMPLAINTS 2022/2023 (Pages 21 - 38)

To provide the annual update in relation to corporate complaints and complaints considered by the Local Government & Social Care Ombudsman and the Housing Ombudsman.

8. MATTERS FROM WHICH THE PUBLIC MAY BE EXCLUDED

To consider the passing of a resolution under Section 100A(4) of the Local Government Act 1972 excluding the public from the undermentioned item of business on the grounds that it involves the likely disclosure of exempt information as defined in paragraphs 1 and 10 of Schedule 12A of the 1972 Act.

9. COMPLAINTS UPDATE

An update will be provided on complaints 2023/14 and 2023/15 which were considered at the previous meeting.



HINCKLEY AND BOSWORTH BOROUGH COUNCIL

ETHICAL GOVERNANCE AND PERSONNEL COMMITTEE

2 AUGUST 2023 AT 6.30 PM

PRESENT: Cllr A Pendlebury - Chair

Cllr CM Allen, Cllr MA Cook, Cllr MJ Crooks, Cllr WJ Crooks, Cllr L Hodgkins (for Cllr MB Cartwright), Cllr LJ Mullaney (for Cllr KWP Lynch), Cllr LJP O'Shea and Cllr BR Walker (for Cllr E Hollick)

Also in attendance: Mr G Grimes, Independent Person

Officers in attendance: Julie Kenny and Rebecca Owen

75. Apologies and substitutions

Apologies for absence were submitted on behalf of Councillors Cartwright, Hollick and Lynch, with the following substitutions authorised in accordance with council procedure rule 10:

Councillor Hodgkins for Councillor Cartwright Councillor L Mullaney for Councillor Lynch Councillor Walker for Councillor Hollick.

76. Minutes of previous meeting

It was moved by Councillor Hodgkins, seconded by Councillor Cook and

RESOLVED – the minutes of the meeting held on 15 February be approved as a correct record.

77. Declarations of interest

Councillor Allen declared a personal, non-registrable interest in complaint 2023/14 as the subject member was a close associate.

Councillor O'Shea declared a personal, non-registrable interest in complaint 2023/15 as the subject member was a close associate.

78. Matters from which the public may be excluded

On the motion of Councillor Pendlebury seconded by Councillor J Crooks, it was

RESOLVED – in accordance with section 100A(4) of the Local Government Act 1972, the public be excluded from the following items of business on the grounds that they involve the disclosure of exempt information as defined in the paragraphs of Part I of Schedule 12A of that Act as stated under each item.

79. Statutory Safety Committee minutes

This item was exempt in accordance with paragraphs 3 and 10.

Members received the minutes of the Statutory Safety Committee for information. In response to a member's question, it was agreed that the outcome of the investigation on page 25 would be communicated to members when concluded.

80. Complaints update

This item was exempt in accordance with paragraphs 1 and 10.

It was noted there were no outstanding complaints other than those on the agenda for this meeting.

81. **Complaint 2023/12**

This item was exempt in accordance with paragraphs 1 and 10.

Consideration was given to two complaints about the same matter which alleged a parish councillor had breached the code of conduct. It was noted that the parish councillor had been requested to apologise but didn't feel their actions had caused upset and had refused to do so.

Members agreed that the subject member had been acting in their capacity as a councillor when the alleged actions took place and felt that, regardless of whether the upset caused had been intentional, they should be aware of the effect that their comments had had. The committee also considered it important that one of the complaints had been made by a professional body. Concern was expressed that a councillor was operating in a position which would usually be undertaken by a paid employee, particularly when the position required a great deal of sensitivity.

It was moved by Councillor O'Shea and seconded by Councillor W Crooks that the matter constituted a breach of the code of conduct and that the subject member be formally requested to apologise, that the parish council be recommended to employ a paid member of staff in the role rather than a councillor, and that condolences be sent to the complainant. Upon being put to the vote, the motion was CARRIED and it was unanimously

RESOLVED -

- (i) The subject member be requested to send a written apology to the main complainant;
- (ii) The parish council be recommended to employ a paid member of staff in the role rather than a councillor;
- (iii) Condolences be sent to the subject member.

Having declared a personal interest in the following item, Councillor Allen left the meeting at 6.52pm.

82. **Complaint 2023/14**

This item was exempt in accordance with paragraphs 1 and 10.

The committee considered a complaint which alleged that a parish councillor had breached the code of conduct by using aggressive and unnecessary language in a text message.

Members agreed that the subject member had been acting in their capacity as councillor when the exchange took place. They also had copies of the messages as evidence and therefore felt that no further investigation was required as it was clear that the language used was in breach of the code of conduct. The response from the subject member was taken into account but it was felt that this didn't mitigate the language used and it was unacceptable for a councillor to use such language regardless of the circumstances.

It was moved by Councillor J Crooks and seconded by Councillor Walker that the subject member be asked to apologise and to attend training, and should they not do so, the decision notice would be published. Upon being put to the vote, the motion was CARRIED and it was unanimously

RESOLVED -

- (i) The subject member be requested to apologise;
- (ii) The subject member be requested to attend suitable training;
- (iii) Should compliance with (i) and (ii) above not be forthcoming, the decision notice be published.

Councillor Allen returned to the meeting at 7.04pm and, having declared a personal interest in the following item, Councillor O'Shea left at 7.05pm.

83. **Complaint 2023/15**

This items was exempt in accordance with paragraphs 1 and 10.

Members considered a number of complaints which alleged a parish councillor used unacceptable language directed at the chair and the clerk in a meeting. It was accepted that the complainants would remain anonymous due to fear of reprisals.

Members agreed that the subject member had been acting in their capacity as councillor at the time of the alleged comments. It was noted that the comments had not been refuted by the subject member, only counter-allegations made, and that much of the response from the subject member was irrelevant to the case. Whilst emails of support for the subject member had been received, stating that the comment towards the chair had not been made, it was reported that the Monitoring Officer had listened to a recording of the meeting and had heard the comment.

Members were reminded that their decision must be whether, on the balance of probabilities, the comments were made by the subject member and, if so, whether they constituted a breach of the code of conduct. The committee agreed that an investigation would not provide any further information as witness statements had already been provided on both sides. They also felt that it would draw out the process unnecessarily for those who had been brave enough to come forward and report that matter.

It was moved by Councillor Walker and seconded by Councillor Allen that, on the balance of probabilities, the comments had been made by the subject member and therefore constituted a breach of the code of conduct. It was proposed that the subject member be requested to apologise to the chair in writing and to undertake diversity training and, should they not comply with this, the decision notice be published. Upon being put to the vote, the motion was CARRIED and it was unanimously

RESOLVED -

- (i) The subject member be requested to apologise to the chair in writing;
- (ii) The subject member be requested to attend diversity training;
- (iii) Should compliance with (i) and (ii) above not be forthcoming, the decision notice be published.

(The Meeting closed at 7.25 pm)

CHAIR



Forward timetable of consultation and decision making

Ethical Governance & Personnel Committee 10 October 2023

Social Media Policy and Guidelines

Report of Director Corporate Services.

1. Purpose of report

1.1 This report contains the updated social media guidance and best practices for employees and councillors.

2. Recommendation

2.1 Agree and note the updated social media policy and guidelines for employees and elected members.

3. Background to the report

- 3.1 The council's first social media policy and guidelines document was approved by the council's Ethical Governance and Personnel Committee in August 2013. Since then, the media landscape has changed radically, with the council relying on social media more than ever to communicate with residents. At the same time, the function of social media platforms and the widespread use of smartphones has opened up social media to a wider audience, making it possible for anyone to record and share images with a worldwide audience direct from their mobile phone.
- 3.2 The new updated policy provides guidance for those who work for or who are associated in any way with Hinckley & Bosworth Borough Council (HBBC) on how to responsibly use social media at work and in their personal lives. It also includes some guidance and best practice advice for councillors. It supports the council's own social media account editors and service managers in dealing with any issues that arise and supports the council's HR and ICT procedures to manage inappropriate content.

- 3.3 The council's multi-disciplinary group of social media editors and the web editor have contributed to this policy and endorse it.
- 3.4 The main updates made to the 2013 policy are:
 - Widened the policy to include social media platforms that have grown in popularity since 2013 – notably TikTok, Instagram and Nextdoor. The council does not currently have a TikTok account but it is included in the policy due to its popularity.
 - Set out the GDPR compliant process required for gaining consent before publishing photos and videos of people on social media.
 - Added a new section setting out the law as it applies to social media. This
 includes general legal issues that all social media users should be aware
 of including the laws of libel, copyright, data protection and for the
 safeguarding children and vulnerable adults.
 - A reminder for all employees in politically restricted posts to remain
 politically neutral when posting, sharing or reacting to social media posts,
 even in a private capacity. Additionally, a new section sets out the stricter
 rules that apply to all employees during the pre-election period.
 - Clarifying the formal permissions process that must be undertaken by any team wishing to set up a new HBBC social media account.
 - Ensuring any images recorded by employees while at work have all the
 appropriate permissions in place and do not show conduct that could bring
 the council into disrepute or breach confidentiality, particularly if those
 images are to be shared on social media. The policy reminds all
 employees that breaches of the policy can result in disciplinary action.
 - Included new separate guidance for elected members.
- 3.5 The Communications Team will work with service managers to make sure the policy and guidance is cascaded throughout the organisation so that all employees understand and respect the policy.
- 3.6 Unison has undertaken staff consultation on this policy its recommendations have been noted and/or adopted.
- 4. Exemptions in accordance with the Access to Information procedure rules
- 4.1 open session
- 5. Financial implications (IB)
- 5.1 None
- 6. Legal implications (MR)
- 6.1 Set out in the amended guidance.

7. Corporate Plan implications

7.1 Set out in the amended guidance.

8. Consultation

8.1 Unison, council social media account users (cultural services, Atkins Building, town centre, communications) and the Web Officer were consulted on the content of this policy.

9. Risk implications

- 9.1 It is the council's policy to proactively identify and manage significant risks which may prevent delivery of business objectives.
- 9.2 It is not possible to eliminate or manage all risks all of the time and risks will remain which have not been identified. However, it is the officer's opinion based on the information available, that the significant risks associated with this decision / project have been identified, assessed and that controls are in place to manage them effectively.
- 9.3 The following significant risks associated with this report / decisions were identified from this assessment:

Management of significant (Net Red) risks

	/	
Risk description	Mitigating actions	Owner
S.04 Damage to reputation/adverse	This policy supports the	Bill
publicity	code of conduct for officers	Cullen
	and councillors and the	
	ICT acceptable use policy.	

10. Knowing your community – equality and rural implications

10.1 Set out in the revised guidance.

11. Climate implications

11.1 set out in the revised guidance

12. Corporate implications

- 12.1 By submitting this report, the report author has taken the following into account:
 - Community safety implications
 - Environmental implications
 - ICT implications
 - Asset management implications
 - Procurement implications
 - Human resources implications

Planning implications
Data protection implications

Voluntary sector

Background papers: Social Media Policy and Guidelines

Jacqueline Puffett ext 5630 Councillor S Bray Contact officer:

Executive member:

Hinckley & Bosworth Borough Council

Social Media Policy and Guidelines



1.0 Purpose

1.1 The purpose of this Social Media Policy is to set out guidelines for those who work for, or are associated in any way with Hinckley & Bosworth Borough Council (HBBC) and <u>includes a section written for council members</u>. This policy sets out a fair, transparent, and practical measure that will contribute to the protection of the council and employees' credibility and reputation.

2.0 Scope

21. This procedure applies to all employees, council members, agency workers and those undertaking duties for or on behalf of HBBC as well as partners working with HBBC. Suppliers and service providers will be made aware of their duties and responsibilities during the procurement process.

3.0 Principles

3.1 This policy deals with the use of all forms of social media, including: Facebook, LinkedIn, Twitter, YouTube, Instagram, TikTok, Nextdoor all other social networking sites, and all other Internet postings, including blogs.

It applies to the use of social media for both business and personal purposes, whether during office hours or otherwise.

This policy applies regardless of whether the social media is accessed using:

- IT facilities and equipment provided by HBBC
- Equipment belonging to you or others,
- A smart phone,
- Any other device that can be used to access the internet

3.2 Social Media and the Law

The public nature of social media raises some general legal issues which ALL users should be aware of:

- **Libel:** If you publish an untrue statement about a person which is damaging to their reputation, they may take a libel action against you. A successful libel claim against you will result in you having to pay damages to the person you libelled.
- **Copyright:** Placing images or text on your site from a copyrighted source (for example extracts from publications or photos) without permission is likely to breach copyright. Avoid publishing anything you are unsure about, or seek permission in advance. Breach of copyright may result in you having to pay damages to the person whose work you used. The communications team can supply you with original images or royalty free images if required for council purposes.
- **Data Protection:** Avoid publishing the personal data of individuals unless you have their express permission. Breaches can be reported to the ICO (Information Commissioner's Office) and can result in unlimited penalties for the council.
- Photography and video: Images of people are personal data so care must be taken when
 publishing photographs of people on social media. You must seek consent before publishing
 photographs of individuals. If photos or film is to be recorded in a public place then you must warn
 the public of this using your best endeavours and offer people the choice to opt out of being
 filmed.
- Safeguarding children, young people and vulnerable adults: Staff who have direct or indirect contact with children, families and vulnerable adults in the course of their work have a

responsibility to safeguard and promote the welfare of vulnerable adults and children. You should bear this in mind in your social media activities. Promote online safety and make sure that your content is suitable. Never ask users to divulge any personal details, including their home address, email address, school name or mobile phone number.

• Regulation of Investigatory Powers (RIPA) Compliance: Officers must consult the Council's RIPA policy before using HBBC social media accounts to undertake surveillance or investigations to ensure any activity is compliant.

4.0 Policy

- 1. Employees may be required to remove immediately any Internet postings and social media communications which are deemed to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action, including dismissal.
- 2. Employees are reminded of their contractual duty and mustn't make statements that could be construed as being damaging or detrimental to the reputation of HBBC. They must not post or communicate disparaging or defamatory statements using social media or otherwise about:
 - Our employees
 - Our councillors
 - Our clients, customers or tenants
 - Our suppliers, their agents or contractors
 - Our services

Politically restricted posts

Officers in politically restricted posts must not publicly express support for a political party, including, but not limited to, activity on social media. This includes all social media activity, irrespective of any privacy settings that may have been applied. The HR team can advise which posts are designated as politically restricted.

- 3. There are specific policies for addressing individual's concerns that relate to Whistle Blowing, Grievances and or Bullying and Harassment allegations. Social Media must never be used in place of the formal policies which do offer individuals elements of legal protection. Employees are personally responsible for what they communicate via social media. Employees must be aware that anything they publish might be read or accessed by an audience wider than intended. Employees should ensure that any social media posting is communicated on their own behalf and does not appear to be linked with Hinckley & Bosworth Borough Council in any way.
- 4. Employees must not post comments about sensitive or confidential business-related topics.
- 5. Any alleged breach of this policy will result in a full and thorough investigation which may lead to disciplinary action being taken, and this may include dismissal. Disciplinary action may be taken whether:
 - the breach is committed during working hours or not,
 - it was intended or not; and
 - regardless of whether Hinckley & Bosworth Borough Council equipment was used for the purpose of committing the breach.

If an employee is suspected of committing a breach of this policy, they will be required to co-operate with

6.	It is the responsibility of all employees to read and understand the guidelines provided with this policy.

Social Media Guidelines (to be distributed to staff)

Introduction

Code of Conduct and Acceptable Usage Policy for Email, the Internet and Corporate Network Access provides the foundation for the following Social Media Guidelines for employees of Hinckley & Bosworth Borough Council.

As outlined in the Officers' Code of Conduct, as a responsible employer, the council fully respects that, in general, what staff do on their own time is their affair. However, activities in or outside of work that affect job performance, the performance of others or the council's reputation are a proper focus for council policy.

That's why the same principles and guidelines that apply to HBBC employees activities in general, as found in the Officers' Code of Conduct, apply to employees' activities online. As such, a serious breach of these guidelines will be treated as a disciplinary matter.

Definition of social media

For the purposes of these guidelines, social media is held to include:

- Blogs (e.g. Wordpress, Tumblr, Blogger)
- Micro-blogging (e.g. Twitter)
- Forums
- Networks (e.g. Facebook, LinkedIn, Nextdoor)
- File,image- and video-sharing sites (e.g. YouTube, Instagram, Tiktok)

New social media tools are being created all the time, so this list is not exhaustive.

The council's social media accounts on twitter, Facebook, LinkedIn and Instagram are accessible only to the Communications Team and HBBC social media trained users.. Any new social media accounts for HBBC services or groups should only be created following agreement from SLT through the Communications Team. New profiles and groups will only be agreed if:

- A clear business need can be proven
- Sufficient resources are made available to maintain the account and respond to feedback generated by the service/project lead.

The service area will be responsible for regularly updating the profile/group to ensure its content remains fresh and relevant.

The council recognises that many employees make use of social media in a personal capacity. While they are not acting on behalf of Hinckley & Bosworth Borough Council and may not identify themselves as a Hinckley & Bosworth Borough Council employee, employees must be aware that they can damage the organisation if their conduct on social media is unacceptable.

These guidelines aim to provide helpful, practical advice to protect both the employer and the employee using social media sites – whether that is inside or outside of work.

Social Media Guidelines

- 1. All council employees are bound by the Officers' Code of Conduct and Acceptable Usage Policy for Email, the Internet and Corporate Network Access.
- 2. The principles covering the use of social media by council employees in a personal capacity are the same as those that apply for any other media. Social media is a public forum and the same considerations apply as would, say, to speaking in public or writing something for publication either officially or outside of work.
- 3. Every employee is considered to be personally responsible for the content they publish online. This may mean that information published online will remain public for a long time and may still be seen after it has been deleted. In social media, the boundaries between professional and personal can sometimes become more blurred so it's important to be particularly careful. If you're about to publish, share or be seen to react to something that makes you even the slightest bit uncomfortable, and it is related to the council, feel free to discuss it with your manager or the Communications Team first. Ultimately, however, you have sole responsibility for what you post, publish, share or react to in any form of online social media.
- 4. Council employees and councillors receive a great deal of information relating to the council's business, as well as confidential information about customers, businesses, councillors and other employees. Much of this information needs to be treated as confidential and should not be disclosed either inside or outside work, even to family and friends without authority. In the same way, such information should not be disclosed on social media, even to colleagues, as this can be viewed publicly by others. Similarly, you should not publish anything that might allow inferences to be drawn which could embarrass or damage a customer, councillor or another employee.
- Be aware of your association with HBBC in online social networks. If you identify yourself as a HBBC employee or if you can be identified as an HBBC employee such as by your association with work colleagues on social media sites, you should ensure your profile and related content is consistent with how you wish to present yourself to colleagues and customers:
 - **a.** Don't use racist, sexist or other bigoted language, personal insults, obscenity, or engage in any conduct that would not be acceptable in your workplace, for example by:
 - Making offensive or derogatory comments relating to sex, gender reassignment, race (including nationality), disability, sexual orientation, religion or belief or age
 - Using social media to bully another individual (such as an employee of the organisation)
 - Posting images that are discriminatory or offensive or links to such content.
- 6. Although many social media accounts allow users to adopt a made-up identity, if you choose to use a pseudonym, be aware that your true identity is likely to be revealed over time through the content you publish and your contact with others. If talking about the council, staff and councillors should be clear about their own personal role and the service that they represent and not say anything that might bring the council into disrepute.
- 7. You must show proper consideration for others' privacy and for topics that may be considered objectionable or inflammatory—such as politics -which might be seen to compromise your impartial service to the council.
- **8.** Don't use online social media to air your differences in an inappropriate manner.
- **9.** Take care about commenting on council policies or practices and avoid commenting, sharing or reacting altogether to controversial issues:

- **a.** Do not deny or affirm work-related rumours (or suggest the same in subtle ways) or speculate about them in any way.
- **b.** Be careful about expressing any political comment or showing support for a political party or councilor in a way that may compromise the reputation of the council or appear to put the council in a conflict of interest.
- **10.** Think carefully before you take photos or video while you are working. You must:
 - Ensure you have the consent of your manager to be recording film/photos while at work.
 - Check you have consent of everyone involved before you share photos or video footage recorded
 while you are working on your personal social media accounts. You must be certain that everyone
 in the images colleagues or members of the public has granted consent for it to be published
 on social media.
 - Ensure you are not breaching confidentiality or privacy or revealing information that has not yet been shared widely.

Make sure that anything you post is appropriate conduct in the workplace and does not bring the council into disrepute.

11. If you do choose to publish appropriate content online relating to the council or council matters in your personal capacity, you must make it clear that you are speaking for yourself and not on behalf of the council. You should use a disclaimer such as this: "The postings on this site are my own and don't necessarily represent the opinions of Hinckley & Bosworth Borough Council". It remains the case that some topics relating to the council are confidential and should never be discussed, even if you're expressing your own opinion and using a disclaimer.

12. Pre-election period

During pre-election periods - which are always announced well in advance – stricter rules apply to all staff, irrespective of whether or not they are in politically restricted posts.

During this period, officers must avoid any action which is, or may reasonably be perceived as being, supportive of any party or candidate, and must not engage in party political activity that compromises their neutrality and objectivity at work.

So far as social media is concerned, officers must not engage in any activity which may be seen, or perceived, as being supportive of any political party or campaign. This is irrespective of any privacy settings that may have been applied

13. Excessive use of social media at work

Staff should not spend time while at work using social media websites unless it is for work related purposes.

14. Monitoring use of social media during work time The council reserves the right to monitor employee's internet usage. For full details see the council's <u>Acceptable Usage Policy for email, the internet and corporate network access.</u>

- 15. When you see misrepresentations made about the council by the media or others, you may choose to add comments on the original discussion to point that out. Always do so with respect, stick to the facts and identify your affiliation to the council. You must make sure that what you say is factual and that it does not disparage others. This does not mean that you have to put up with rude or offensive remarks being made to you, but if you choose to reply, you should do so in the same professional way as you would if those remarks were being made to your face or over the phone.
- 16. If you hear something on social media that you need to feed back to colleagues, then please pass that information on to the relevant person. For instance, if you come across people complaining that the website isn't working, please pass that information on to the Communications Team to rectify.
- **17.** Don't use the HBBC logo unless approved to do so.
- **18.** Respect copyright laws when posting any material, particularly photographs. For advice contact the Communications Team.
- 19. Ensure that your online activities do not interfere with your job, your colleagues or commitments to customer. If you are not using the site as part of the job, you should always access social media sites in your own time.
- **20.** Authorised users should not spend more time using social media sites in the course of their employment than is necessary for the purpose of council public communication. Priority should be given to sites which are widely used by the general public.
- 21. If you update open access editable sites such as wiki, then be aware that most wiki sites record the IP address of the editing computer. Alterations to wiki sites may appear as if they have come from the council itself. Officers should not act in a manner that may bring the council into disrepute and should not post derogatory or offensive comment on any online wiki sites.
- 22. Make sure you maintain boundaries between personal and professional lives by avoiding inappropriate personal information becoming visible to members of a group or followers of a social media account, such as by tagging an employee's private social media account on one of the council's posts.
- 23. Remember that the laws of defamation and harassment apply to social media in the same way as written or spoken communication. This means that individuals can sue you personally for damages if they consider their reputation has been or may be harmed or if your posts constitute harassment.
- **24.** Remember to keep your manager and other relevant officers updated on your work and to flag in appropriate content to the communications team.
- 25. Employees should note that any breaches of this policy could lead to disciplinary action. Serious breaches of this policy, for example any reported incidents of bullying of colleagues, or social media activity causing serious damage to the council, will be investigated and if found to constitute gross misconduct, could lead to summary dismissal.

Social Media Guidelines for Councillors

Welcome to your social media guidance - we want you to use this guide to help you get the best out of social media.

We want to encourage you to use social media and give you the freedom to support the council with the proper guidelines.

Social media is a website or app that helps you create and share content and communicate with others. Social media platforms include Facebook, Twitter, Instagram, TikTok, Snapchat, WhatsApp, LinkedIn, YouTube, Flickr and Nextdoor. It also includes SharePoint and Teams. This list is not exhaustive and consists of any platform, website and application that focuses on communication, community-based input, interaction, content-sharing and collaboration. The guidance also covers any new platforms which will be developed in the future. You should follow this guidance if you're an elected member of Hinckley & Bosworth Borough Council. It's also applicable to candidates who are standing to be elected to Hinckley & Bosworth Borough Council. For information, throughout this guide, the terms 'we' and 'us' are used to describe the Communications Team.

Key points:

- Whatever you say on social media, you're likely to be considered as representing your role as an elected member of Hinckley & Bosworth Borough Council— even when on your own personal pages. We want you to feel confident and safe using social media as a communication channel.
- When posting on social platforms, your integrity is on display for people to see, so be ethical, respectful, truthful, and decent. Anything you publish must be true, not misleading, and all claims must be substantiated and approved.
- Protecting the reputation of Hinckley & Bosworth Borough Council is an essential part of your role as an elected member. Do not post any confidential information on any social platforms. If the council has not officially released the information, don't discuss it. This includes financial data, service data and information, and legal information.
- If you're unsure whether to post, comment on or share something, err on the side of caution and don't.
- Your interactions with the public can be used and re-used on social media. This could include emails, pictures and videos. Bear this in mind in how you interact and respond to the public in your day-to-day role.

Your personal social media pages.

You may have separate social media pages – one as an elected member and one as your own personal page.

We want you to be proud to be an elected member of Hinckley & Bosworth Borough Council. This is fine if you want to show this on your own social media pages as part of your own profile. It's good practice to have a disclaimer to clarify that comments are your personal views and do not represent the council's view. This makes it clear that you may understand the council better, but you're not making official declarations. Use wording in your profile such as 'Views expressed are my own and not in my role as a councillor'. If you're carrying out a legitimate role that involves posting comments on social media, for example, as a community action group representative etc., you need to make clear in which capacity you're posting.

Using social media for council business

Councillors should be mindful that posts, tweets or comments on social media about the council or your role as an elected member are treated the same way as any other communications. They are covered by your Code of Conduct

for Elected Members – you will note the latest code of conduct includes a section on the use of social media for council business. If anyone considers that your posts, tweets or comments on social media have failed to comply with the Code of Conduct for Elected Members, you may be subject to a complaint to the council's monitoring officer.

Your responsibility when using social media

Even if you're using your personal social media page, the world will always see you as a reflection of the council. Anything you post on a social media site is your responsibility. This includes content you create, share, and people's comments and reactions linked to your content. Content can be there permanently, regardless of whether you try to remove it. There'll always be a permanent record of everything you post. Irrespective of your privacy settings, posts can, and often do, become publicly available through screenshots, hacking and other methods.

Bias and pre-determination: If you are involved in determining planning or licensing applications or other legal decisions, avoid publishing anything on social media that might suggest you don't have an open mind about a matter you may be involved in determining. Otherwise, the decision runs the risk of being invalidated. Members of a Planning Committee need to avoid any appearance of bias or of having predetermined their view before taking a decision on a planning application. There is an important difference between predisposition and predetermination. Predisposition is where a councillor may have campaigned for or against a proposal or expressed an initial view. However, if the councillor is clear they have an open mind and are willing to listen to all the arguments and evidence presented at the Planning Committee before deciding on how to exercise their vote, there is no predetermination. Predetermination goes beyond predisposition and is where a councillor has a closed mind and is not prepared to listen to any other viewpoint. Councillors are advised to seek advice from the monitoring officer.

Although people have differing views on many issues, any form of online bullying is not acceptable on any platform. Consider what you're posting, how you manage your page, and how this may reflect the council's values and reputation. Do not engage in content that could be perceived as online bullying and brings the council into disrepute or has the potential to adversely affect the council's reputation or business. This includes content you create, share, and people's comments and reactions linked to your content. Online bullying includes inappropriate content concerning the council's services, council employees and other elected members, residents, businesses, customers or suppliers. You'll be asked to remove the content, and the council may investigate and start disciplinary action against you. Depending on the content, we may also report it to Leicestershire Police.

Dos and don'ts at a glance (adapted from the LGA website)

Do:

- talk to residents, staff and others. And do answer their questions (quickly and honestly)
- be responsible at all times
- be respectful at all times, too
- have a personality corporate speak or just issuing press releases won't work well on social media
- share other people's helpful content and links
- share photographs, images, video footage and comments of elected members or employees with their consent and within UK GDPR regulations.
- credit other people's work, ideas and links
- listen (social media is designed to be a two-way channel, just like any good conversation)
- ask your own questions. Seek feedback from your residents (but make sure you share the results with them)
- adhere to your existing HR policies such as the Code of Conduct for elected members and this social media guidance
- understand your responsibility for the content you create, content you share, and people's comments and reactions linked to your content
- check your privacy settings and make sure you understand what people can see and what they can do with your

content.

- follow the council's Information and security and computer usage policy and Code of Conduct for elected members when using council equipment and your council login.
- talk to your communications team they are there to help you
- and more than anything, do use social media in the spirit in which it was intended to engage, openly and honestly.

Don't

- broadcast or talk at people. Your residents will soon spot broadcasts and respond accordingly
- block social media social media is not a risk, blocking its use is a risk
- raise council-related issues on social media. Use the process in place to get more information and facts
- say things that could damage the council's reputation or other organisations or brands associated with the council
- divulge confidential information about, or belonging to, the council, people who use our services, employees or other elected members.
- impersonate other elected members or employees on social media sites and forums
- try to cover up mistakes, be honest and you'll get more respect for it in the long run
- build accounts and just hope people will come sometimes it is best to go to the places where your audiences are already having conversations
- assume that social media will look after itself you will need to invest time, enthusiasm and energy to make it work. And don't leave your accounts unattended for long spells
- ignore legal advice, it's there to help you
- think that a disclaimer in your bio will save you from potential legal action, it won't
- share your passwords with anyone

Legal guidance on using social media

Comments made on a public forum are in the public domain. Updating your site settings to private will not protect you if you're found in breach of this guidance. Consider whether your comments or actions could be considered defamatory, derogatory or offensive, as this could result in somebody taking legal action against you as well as against the council or making a formal complaint about you. If someone is taking legal proceedings against an elected member or employee because of their defamatory comments or actions on a social media site or online media outlet, the council is entitled, in appropriate cases where the person has acted reasonably and in good faith, to support them in defending those legal proceedings. Tribunals and courts can consider communications recorded on social media sites. It's highly likely that online content, postings and messages will be used as evidence, regardless of the privacy settings of your page.

Breaches of the Code of Conduct for elected members renders you liable to action being taken by the Ethical Governance & Personnel Committee. Failure to observe the conduct and behaviour specified in this code may also render you liable to disciplinary action being taken by your own political group.

Be aware of UK GDPR regulations and consent.

People are free to express their opinion, and most people who follow our pages do this in a balanced way. It's okay for people not to like the service we deliver or to disagree with decisions, and they are free to communicate this. We won't act against these comments, as frustrating as they may be. We do not accept content that is defamatory, slanderous, discriminatory, inciting intimidatory behaviour, or is classed as misinformation (false, misleading or out-of-context material regardless of the motivation behind it) or disinformation (a deliberate attempt to mislead using material that the deceiver knows is untrue, designed to be widely shared).

Managing unacceptable content on social media pages

Our council social media pages are governed by our social media acceptable use policy (social media house rules). It covers all of the council's pages and outlines the standards we expect on our social media sites; it's a key enforcement step in establishing a positive behaviour change on online channels.

The LGA has a Councillors' guide to handling harassment, abuse and intimidation If you need information or support, please contact the communications team, the democratic services team or the monitoring officer at the council.



Forward timetable of consultation and decision making

Ethical Governance & Personnel Committee 10 October 2023

Wards affected: All wards

CORPORATE COMPLAINTS 2022-23

Report of the Monitoring Officer

1. Purpose of report

1.1 To inform members of complaints received under the council's two-stage complaints process and the outcome of these, and complaints received via the Local Government and Social Care Ombudsman and Housing Ombudsman.

2. Recommendation

2.1 The report be endorsed.

3. Background to the report

- 3.1 The council operates a two-stage complaints procedure which deals with complaints about council services (including those carried out on behalf of the council by contractors or partners) and actions or lack of action by the authority or its officers.
- 3.2 At the first stage, a complaint will be sent to the relevant manager for a response, which should be provided within ten working days. The response should usually state whether or not the complaint is upheld and give reasons for the decision. If, due to the level of investigation required, it is not possible to respond within this timescale, the responding officer must contact the complainant to explain the reasons for this and to let them know when they may expect a response.
- 3.3 If a complainant is not satisfied with the response received to their complaint at stage 1, they may request a review of the matter. The review ("stage 2") is

- reviewed by a more senior officer or an officer from a different service area who has not been involved in the case.
- 3.4 Should the complainant remain dissatisfied after stage 2 of the process, they have the opportunity to put their complaint to the Local Government and Social Care Ombudsman or the Housing Ombudsman, who will usually contact us to ask for further details of the case, copies of correspondence and later in the process, a response from officers.
- 3.5 The complaints and Ombudsman process is administered by Democratic Services, and a record is kept which includes a summary of the complaint and the outcome in order to monitor patterns and learn from complaints.
- 3.6 Under the constitution, monitoring of the complaints process is the responsibility of the Ethical Governance & Personnel Committee, and as such these reports are brought to the committee annually.

Breakdown of complaints received 2022/23

3.7 During the period 1 April 2022 to 31 March 2023 a total of 208 complaints were processed under the formal complaints procedure.

The number of complaints in 41 service categories is as below:

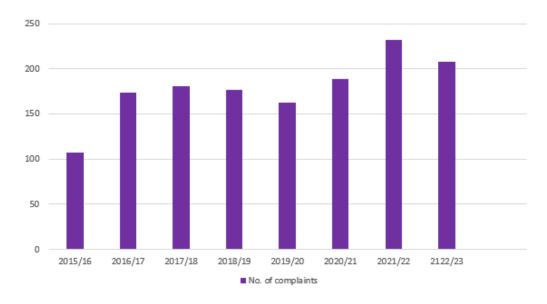
Car Parks	3
Clean Neighbourhoods	1
Communications	1
Cultural Services – Events	1
Customer Services	3
Customer Services & Revenues	1
Customer Services & Refuse	1
Democratic Services	1
Electoral Services	1
Environmental Health	4
Environmental Health & Housing Repairs	1
Environmental Health – Licensing	1
Environmental Health – Noise	3
Estates & Assets	1
Estates, Revenues & ASB	1
Finance	1
Green Spaces	7
Green Spaces & Communications	1
Housing – Allocations	1
Housing – Anti-Social Behaviour	1
Housing – ASB & Tenancy Management	2
Housing – ASB & E Health Noise	1
Housing – Community Safety	1
Housing – Homelessness	4
Housing – Homelessness & E Health	1
Housing – Options	3

Housing – Repairs	22
Housing – Rents	2
Housing – Tenancy Management	15
Housing – Right to Buy	1
Human Resources	1
ICT	2
Monitoring Officer	2
Planning	1
Planning – Enforcement	3
Planning – Development Management	23
Planning – Building Control	2
Refuse & Recycling	38
Revenues & Benefits	48
General	1
Total number of complaints	208

3.8 The number of complaints received compares with the previous years as follows:

2022/23	208	2018/19	177
2021/22	232	2017/18	181
2020/21	189	2016/17	174
2019/20	163	2015/16	107

Number of complaints from 2015/16 - 2023



3.9 There has been a 12% decrease in complaints to the authority this year. In previous years, complaints increased in part due to the introduction of an online complaints form, which made it easier for customers to make a complaint. This led to an increase in complaints that would previously have been dealt with in the course of business following a phone call to Customer Services or the appropriate team.

3.10 Of the 208 complaints processed, the following outcomes were recorded:

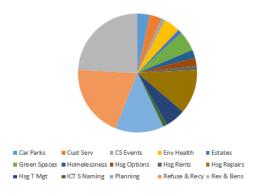
Complaint upheld	72
Complaint upheld in part	24
Complaint not upheld	107
Withdrawn	1
Not completed	4

3.11 In order to learn from complaints and, more importantly, the instances where complaints have been upheld or upheld in part, these can be broken down as follows:

Car Parks	3
Customer Services	3
Cultural Services – Events	1
Environmental Health	1
Environmental Health – Licensing	1
Environmental Health – Noise	2
Estates & Assets	1
Green Spaces	5
Housing – Homelessness	2
Housing Options	2
Housing Rents	1
Housing - Repairs	11
Housing – Tenancy Management	5
ICT – Street naming	1
Planning – Development Management	12
Refuse & Recycling	17
Refuse & Recycling & Customer Services	1
Revenues & Benefits	26
Revenues & Benefits & Customer Services	1
Total upheld or upheld in part	96

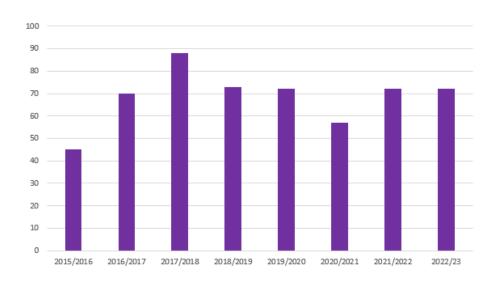
3.12 The following charts show the subject of complaints that have been upheld or upheld in part for 2022/23.

Complaints have been upheld or upheld in part Total 96 for 2022/2023



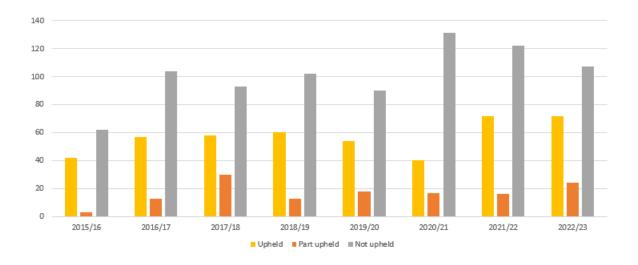
3.13 The following chart shows the number of complaints upheld from 2015/16 to 2022/23.

Complaints upheld from 2015 - 2023



3.14 The following chart shows complaints upheld, upheld in part and not upheld from 2015/16 to 2022/23.

Complaints upheld, upheld in part or not upheld from 2015 to 2023 (6 were either withdrawn or not completed)



3.15 Of the 208 complaints received, 168 went no further than stage 1, suggesting that the complainant was satisfied with the response, and 40 were reviewed at stage 2.

These stage 2 complaints related to the following service areas:

Building Control	1
Community Safety	1
Environmental Health/Homelessness	1
Green Spaces	2
Green Spaces/Corporate Communications	1
Housing – Homelessness	2
Housing – Repairs	1
Housing – Tenancy Management	5
Monitoring Officer	1
Noise/ASB	1
Planning Development Management	8
Refuse & Recycling	4
Revenues & Benefits	11
Revenues/Estates/ASB	1
Total	40

Learning from Complaints

- 3.16 The Ombudsman requests that when reporting on local complaints, authorities should focus on learning and on implementing recommendations for improvements. Complaints are a valuable source of information which helps to identify recurring or underlying problems and potential improvements.
- 3.17 All of the complaints where the complaint was upheld and fault was found have been reviewed to ascertain what action the relevant department has taken, both in remedying the fault, and any wider learning to avoid such issues occurring in the future.

Due to the nature of the complaints that were upheld, measures to resolve the complaint are largely corrective action where the authority has been at fault for poor service.

Corrective action typically consists of both individual redress, for example an apology, carrying out overdue work, reminder to staff of policies and procedures or additional training identified.

Local Government and Social Care Ombudsman (LGSCO) complaints

3.18 During 2022/23 six complaints about this authority were lodged with the LGSCO (not including complaints received by the Ombudsman but dismissed at an early stage without asking us for information). This was two fewer than the previous year.

- 3.19 One of the complaints was investigated and no fault or injustice was found. The remaining complaints were not investigated as no fault was likely to be found.
- 3.20 The annual review letter from the LGSCO is attached as an appendix. The data may not align with our own records due to the number of complaints dismissed without having contacted us for any information and the conclusion of complaints from the previous year within the figures.

Housing Ombudsman complaints

3.21 No complaints were lodged with the Housing Ombudsman during 2022/23, however one complaint lodged the previous year was concluded with a finding of maladministration. The council was required to pay £500 compensation, review its original decision and reiterate its offer of mediation between the tenant and their neighbour.

Persistent and unreasonable complainant behaviour policy

- 3.22 The persistent and unreasonable complainant behaviour policy is in place to address unreasonable behaviour where the frequency or nature of a complainant's contact with the council takes up unjustifiable officer time and resources, making it hard for officers to handle their complaint and/or those of other people, or where their behaviour is offensive or abusive.
- 3.23 The policy has been applied to one person in 2022/23.
- 4. Exemptions in accordance with the Access to Information procedure rules
- 4.1 This report is to be taken in open session.
- 5. Financial implications (IB)
- 5.1 None.
- 6. Legal implications (MR)
- 6.1 None.
- 7. Corporate Plan implications
- 7.1 This report supports all aims and objections by ensuring the public and external organisations have the opportunity to raise issues with the authority which assist in improving services to the public.
- 8. Consultation
- 8.1 None.

9. Risk implications

- 9.1 It is the council's policy to proactively identify and manage significant risks which may prevent delivery of business objectives.
- 9.2 It is not possible to eliminate or manage all risks all of the time and risks will remain which have not been identified. However, it is the officer's opinion based on the information available, that the significant risks associated with this decision/project have been identified, assessed and that controls are in place to manage them effectively.
- 9.3 The following significant risks associated with this report / decisions were identified from this assessment:

Management of significant (Net Red) risks

Risk description	Mitigating actions	Owner
Failure to provide satisfactory	Ensure service areas	Service
services or service improvements	learn from complaints	managers

10. Knowing your community - equality and rural implications

- 10.1 The complaints process about which this report is written is in place to ensure equality in service provision and to protect the rights of the individual. The process is available and accessible to all customers.
- 10.2 Assistance is offered and provided to support complainants in completing the form and in providing all relevant information, and complaints are accepted in the format that is most appropriate for the individual
- 10.3 Where there is a proposed new service, change of service, or a new or reviewed policy, an Equality Impact Assessment is required and has been undertaken and can be viewed here: None required this is not a new service or a review of policy.

11. Climate implications

11.1 This report is not proposing a new policy or service and therefore has no impact on climate change.

12. Corporate implications

- 12.1 By submitting this report, the report author has taken the following into account:
 - Community safety implications
 - Environmental implications
 - ICT implications
 - Asset management implications
 - Procurement implications
 - Human resources implications

- Planning implications

- Data protection implications

- Voluntary sector

Background papers: Previous years' complaints reports

Contact officer: Rebecca Valentine-Wilkinson, Democratic Services Officer

Rebecca Owen, Democratic Services Manager

Executive member: Councillor S Bray





19 July 2023

By email

Mr Cullen
Chief Executive
Hinckley & Bosworth Borough Council

Dear Mr Cullen

Annual Review letter 2022-23

I write to you with your annual summary of complaint statistics from the Local Government and Social Care Ombudsman for the year ending 31 March 2023. The information offers valuable insight about your organisation's approach to complaints. As always, I would encourage you to consider it as part of your corporate governance processes. As such, I have sought to share this letter with the Leader of your Council and Chair of the appropriate Scrutiny Committee, to encourage effective ownership and oversight of complaint outcomes, which offer such valuable opportunities to learn and improve.

The end of the reporting year, saw the retirement of Michael King, drawing his tenure as Local Government Ombudsman to a close. I was delighted to be appointed to the role of Interim Ombudsman in April and look forward to working with you and colleagues across the local government sector in the coming months. I will be building on the strong foundations already in place and will continue to focus on promoting improvement through our work.

Complaint statistics

Our statistics focus on three key areas that help to assess your organisation's commitment to putting things right when they go wrong:

Complaints upheld - We uphold complaints when we find fault in an organisation's actions, including where the organisation accepted fault before we investigated. We include the total number of investigations completed to provide important context for the statistic.

Over the past two years, we have reviewed our processes to ensure we do the most we can with the resources we have. One outcome is that we are more selective about the complaints we look at in detail, prioritising where it is in the public interest to investigate. While providing a more sustainable way for us to work, it has meant that changes in uphold rates this year are not solely down to the nature of the cases coming to us. We are less likely to carry out investigations on 'borderline' issues, so we are naturally finding a higher proportion of fault overall.

Our average uphold rate for all investigations has increased this year and you may find that your organisation's uphold rate is higher than previous years. This means that comparing uphold rates with previous years carries a note of caution. Therefore, I recommend comparing this statistic with that of similar organisations, rather than previous years, to better understand your organisation's performance.

Compliance with recommendations - We recommend ways for organisations to put things right when faults have caused injustice and monitor their compliance with our recommendations. Failure to comply is rare and a compliance rate below 100% is a cause for concern.

Satisfactory remedy provided by the authority - In these cases, the organisation upheld the complaint and we were satisfied with how it offered to put things right. We encourage the early resolution of complaints and credit organisations that accept fault and find appropriate ways to put things right.

Finally, we compare the three key annual statistics for your organisation with similar authorities to provide an average marker of performance. We do this for County Councils, District Councils, Metropolitan Boroughs, Unitary Councils, and London Boroughs.

Your annual data, and a copy of this letter, will be uploaded to our interactive map, <u>Your council's performance</u>, on 26 July 2023. This useful tool places all our data and information about councils in one place. You can find the detail of the decisions we have made about your Council, read the public reports we have issued, and view the service improvements your Council has agreed to make as a result of our investigations, as well as previous annual review letters.

Supporting complaint and service improvement

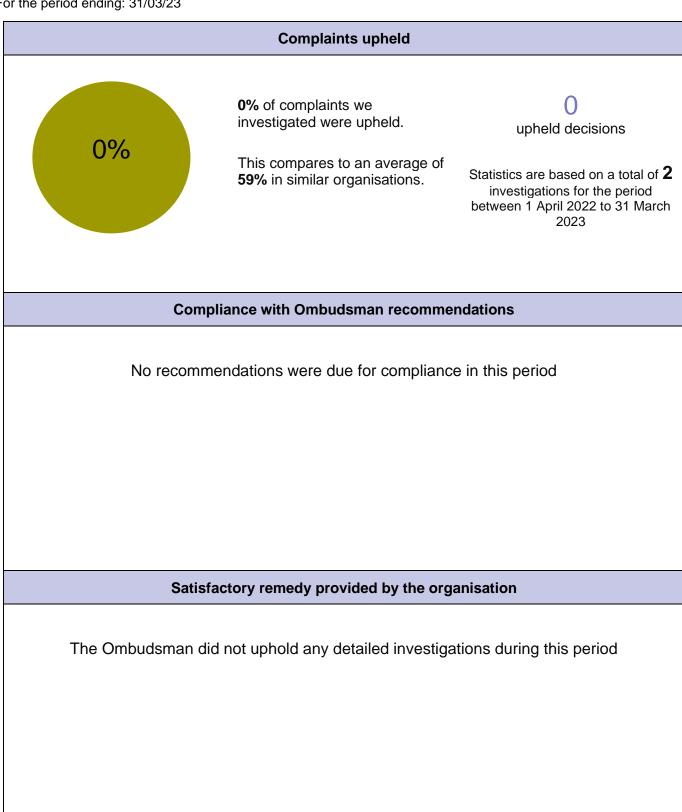
I know that complaints offer organisations a rich source of intelligence and insight that has the potential to be transformational. These insights can indicate a problem with a specific area of service delivery or, more broadly, provide a perspective on an organisation's culture and ability to learn. To realise the potential complaints have to support service improvements, organisations need to have the fundamentals of complaint handling in place. To support you to do so, we have continued our work with the Housing Ombudsman Service to develop a joint complaint handling code that will provide a standard for organisations to work to. We will consult on the code and its implications prior to launch and will be in touch with further details.

In addition, our successful training programme includes practical interactive workshops that help participants develop their complaint handling skills. We can also offer tailored support and bespoke training to target specific issues your organisation might have identified. We delivered 105 online workshops during the year, reaching more than 1350 people. To find out more visit www.lgo.org.uk/training or get in touch at training@lgo.org.uk.

Yours sincerely,

Paul Najsarek

Interim Local Government and Social Care Ombudsman Interim Chair, Commission for Local Administration in England





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Page	
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Reference	Authority	Category	Received
21016930	Hinckley & Bosworth Borough Council	Housing	13/07/2022
22000008	Hinckley & Bosworth Borough Council	Planning & Development	01/04/2022
		Planning & Development	14/06/2022
22006847	Hinckley & Bosworth Borough Council	Corporate & Other Services	31/08/2022
22007000	Hinckley & Bosworth Borough Council	Highways & Transport	24/08/2022
22010902	Hinckley & Bosworth Borough Council	Environmental Services & Public Protection & Regulation	10/11/2022
22013362	Hinckley & Bosworth Borough Council	Environmental Services & Public Protection & Regulation	09/01/2023

Reference	Authority	Category	Decided	Decision	Decision Reason	Remedy	Service improvement recommendations
21015626	Hinckley & Bosworth Borough Council	Environmental Services & Public Protection & Regulation	19/07/2022	Not Upheld	no fault		
21016930	Hinckley & Bosworth Borough Council	Housing	04/08/2022	Closed after initial enquiries	26(6)(a) tribunal Other		
22000008	Hinckley & Bosworth Borough Council	Planning & Development	20/04/2022	Closed after initial enquiries	Not warranted by alleged fault		
22003423	Hinckley & Bosworth Borough Council	Planning & Development	22/06/2022	Closed after initial enquiries	26(6)(b) appeal to Minister		
22006847	Hinckley & Bosworth Borough Council	Corporate & Other Services	21/09/2022	Closed after initial enquiries	Not warranted by alleged fault		
22007000	Hinckley & Bosworth Borough Council	Highways & Transport	15/09/2022	Closed after initial enquiries	26(6)(b) appeal to Minister		
22010902	Hinckley & Bosworth Borough Council	Environmental Services & Public Protection & Regulation	02/03/2023	Not Upheld	no fault		
22013362	Hinckley & Bosworth Borough Council	Environmental Services & Public Protection & Regulation	27/01/2023	Closed after initial enquiries	No worthwhile outcome achievable by inv	estigation/	

Reference	Authority	Category	Decided	Remedy	Remedy Target Date	Remedy Achieved Date	Satisfaction with Compliance
No compliance data recorded during the period							

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