



Northern Ireland

Public Services
Ombudsman

Investigation Report

Investigation of a complaint against Causeway Coast and Glens Borough Council

NIPSO Reference: 17922

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The Role of the Ombudsman

The Northern Ireland Public Services Ombudsman (NIPSO) provides a free, independent and impartial service for investigating complaints about public service providers in Northern Ireland.

The role of the Ombudsman is set out in the Public Services Ombudsman Act (Northern Ireland) 2016 (the 2016 Act). The Ombudsman can normally only accept a complaint after the complaints process of the public service provider has been exhausted.

The Ombudsman may investigate complaints about maladministration on the part of listed authorities. She may also investigate and report on the merits of a decision taken by health and social care bodies, general health care providers and independent providers of health and social care. The purpose of an investigation is to ascertain if the matters alleged in the complaint properly warrant investigation and are in substance true.

Maladministration is not defined in the legislation, but is generally taken to include decisions made following improper consideration, action or inaction; delay; failure to follow procedures or the law; misleading or inaccurate statements; bias; or inadequate record keeping.

Where the Ombudsman finds maladministration or questions the merits of a decision taken in consequence of the exercise of professional judgment she must also consider whether this has resulted in an injustice. Injustice is also not defined in legislation but can include upset, inconvenience, or frustration. The Ombudsman may recommend a remedy where she finds injustice as a consequence of the failings identified in her report.

The Ombudsman has discretion to determine the procedure for investigating a complaint to her Office.

Reporting in the Public Interest

This report is published pursuant to section 44 of the 2016 Act which allows the Ombudsman to publish an investigation report when it is in the public interest to do so.

The Ombudsman has taken into account the interests of the person aggrieved and other persons prior to publishing this report.

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EXECUTIVE SUMMARY

I received a complaint about the failure by Causeway Coast and Glens Borough Council to notify the complainant of a change to a planning application for a replacement dwelling in close proximity to her family home.

Issue of Complaint

I accepted the following issue of complaint for investigation:

Whether the amended plans to the planning application were dealt with in accordance with relevant policy and procedures, specifically in relation to neighbour notification and re-advertisement.

Findings and Conclusion

The investigation of the complaint identified maladministration in respect of the following matters:

- The Council's failure to adequately consider the re-notification and re-advertisement of the amended plans to the application.
- The Council's failure to give adequate reasons for decisions and maintain appropriate records of its consideration.
- The Council's failure to deal with a request for a meeting from an MLA in accordance with its stated policy

I am satisfied that the maladministration I identified caused the complainant to experience the injustice of frustration, anger, uncertainty and loss of opportunity to comment or object to the amended plans.

Recommendations

I recommended:

- The Council Chief Executive should apologise for the failings identified in this report in accordance with my guidance on apology.
- The Council should refund to the complainant the £510 she spent on obtaining planning advice
- The complainant should receive a payment of £2000 from the Council by way of consolatory payment for the injustice of frustration, anger,

uncertainty and loss of opportunity to object.

- The relevant Council's planning officers should be reminded of the need to consider re-notification and re-advertisement in appropriate cases, the relevant considerations involved in making those decisions and the need to make proper contemporaneous records of such decisions.
- The relevant Council planning officers should have training in good record keeping.

THE COMPLAINT

1. I received the complaint on 18 July 2017. It concerned the failure by Causeway Coast & Glens Borough Council (the Council) to notify the complainant of a change to a planning application¹ for a replacement dwelling in close proximity to her family home.

Background

2. When building works commenced in June 2016 the complainant stated she was surprised at how close the building work was to her own house. She stated that she visited the Council planning office to view the plans associated with the application as she had difficulty viewing them using the online public planning portal. She was provided with the plans and was informed by a member of Council staff that they "had been passed". When she viewed the plans the complainant realised they had been amended from the original version which she had previously viewed. The complainant visited the Council's planning office and took a copy of the amended plans. On a third occasion, she visited the office to query the amended plans with Council staff.
3. She complained to the Council on 14 December 2016 about the failure to notify her of the amended plans. She then proceeded with her complaint through the three stages of the Council's complaints policy which included complaining to

¹ On 1 April 2015 the majority of planning functions transferred from central government (the former Department of the Environment) to District Councils. Among other matters District Councils are now responsible for 'development management' – namely determining the vast majority of planning applications. Under the new legislative framework the Planning (General Development Procedure) Order (Northern Ireland) 2015 outlines the revised process for District Councils to determine certain planning applications.

the Council Chief Executive at the final stage.

4. The Council's initial response to her complaint from the Principal Planning Officer dated 1 February 2017 acknowledged that the amended plans were received on 15 April 2016 and '...changed the location of the proposed replacement dwelling and brought it closer to your property'. The letter confirmed that '...you should have received further notification to allow you to consider the amendments if you chose to do so. I apologise that due to a processing error this did not happen'. It was also confirmed that the Case officer had considered the impact of the revised proposal 'not to significantly impact' on the complainant's property.
5. The complainant remained dissatisfied with this response and pursued her complaint to stage 2 in the Council's complaints policy. In its response to the stage 2 complaint, the Head of Performance confirmed that the Council had met the legislative requirements of Article 8 of the Planning (General Development Procedure) Order (Northern Ireland) 2015 regarding the initial neighbour notification. The response dated 31 March 2017 distinguished between the legislative requirement of Article 8 and the 'good administrative practice' given in the Development Management Practice Note 14 which stated:
'During the processing of an application, it may be necessary to re-advertise, re-neighbour notify and display on the relevant website, to advise members of the public that amendments have been made to the proposal. Where amendments or receipt of additional information merit re-advertisement, further neighbour notification should also be carried out. The reason for any further neighbour notification should be made clear.'
6. The March 2017 letter reiterated the Council's apology and stated the failing was 'an error in the processing of this application'. The response indicated 'measures have been taken to ensure such a shortcoming does not reoccur'. An invitation from the complainant for the Council staff to visit her property was declined in this response.
7. The complainant pursued her complaint to Stage 3 of the Council complaints

procedure. She received a letter from the Chief Executive dated 6 June 2017. This was the final stage in the Council's complaints process. The Chief Executive again apologised that a further notification of the amended plans did not occur. The Chief Executive indicated that he had asked the Head of Planning to remind all staff of the importance of fully considering whether re-notification should occur and to record the reasons on the file. He confirmed that further guidance was to be developed to indicate when and how the Council should re-notify on receipt of amended plans. The complainant had queried the decision not to re-advertise the application after receipt of the amended plans. The Chief Executive stated in his letter:

'In this case it was judged that having regard to the nature of the application for a single replacement dwelling in the countryside and the limited scale of the amendment, which involved relocation of siting by approximately 16 metres within the same site, the change was not so substantial to require re-advertisement. Furthermore, regard was had to the fact that no public representations had been received...my staff exercised their judgement in reaching the decision that the change to the application was not substantial to warrant re-advertisement.'

Issue of complaint

8. The complainant complained to my office about the Council's failure to notify her of the amended plans. The issue of complaint which was accepted for investigation was:

Whether the amended plans to the planning application were dealt with in accordance with relevant policy and procedures, specifically in relation to neighbour notification and re-advertisement.

INVESTIGATION METHODOLOGY

9. In order to investigate the complaint the Investigating Officer obtained from the Council all relevant documentation, together with the Council's comments on the issues raised. This documentation included information relating to the Council's investigation of the complaint. To better inform the investigation, a

site visit was also carried out by the Investigating Officer accompanied by a Senior Investigating Officer. As part of the investigation, the draft report was shared with both the Council and the complainant.

Relevant Standards

10. In order to investigate complaints, I must establish a clear understanding of the standards, both of general application and those which are specific to the circumstances of the case.
11. The standards relevant to this complaint are:
 - (i) Planning (General Development Procedure) Order (Northern Ireland) 2015 – ('the 2015 Order')
 - (ii) Development Management Practice Note 14 – Publicity Arrangements and Neighbour Notification (April 2015) - ('Practice Note 14')
 - (iii) The Council's Complaints Procedure
12. My role in complaints about planning matters relates to an examination of the administrative actions of the Council. I am unable to consider the merits of a decision unless there is evidence of maladministration.
13. I have not included all of the information obtained in the course of the investigation in this report. However, I am satisfied that everything that I consider to be relevant to the complaint has been taken into account in reaching my findings.

THE INVESTIGATION

14. I received a letter from the complainant dated 15 July 2017 in relation to the Council's failure to notify her and neighbouring properties of a significant change to a planning application for a replacement dwelling. She stated that she remained dissatisfied with the Council's 'resolution' of her complaint.

15. The planning application for a neighbouring replacement dwelling was received by the Council on 30 June 2015. The complainant received a 'neighbour notification' dated 21 July 2015. The complainant viewed the plans associated with the application using the online public planning portal.
16. The complainant stated that she had been 'denied the right to challenge' the amended plans as the submission of the amended plans had not been drawn to her attention by re-notification or re-advertisement. The impact of the change in the location of the replacement dwelling was outlined in detail by the complainant by reference to maps and photographs. In her complaint she outlined the significant pressures resulting from the final positioning of the dwelling some 16 metres nearer to her property and the 'imposing gable towering over the front corner of our bungalow'.
17. As part of investigation enquiries, the Council provided the following information and documentation:
 - (i) the Council Complaints Policy/Procedures and the complaint file with relevant correspondence
 - (ii) the 2015 Order and Practice Note 14
 - (iii) the Development Management file – ('the planning file')
 - (iv) chronology from planning file
 - (v) the Development Management Officer report
 - (vi) new Council internal advice/guidance and revised checklist/Pro Forma
18. The Council's planning file evidences that after receipt of the original application the case officer engaged in routine statutory planning consultations. In October 2015 and November 2015 the case officer asked the agent to consider changes to the application and provide amended drawings.
19. In January 2016 the Council's Planning Department received a request from the office of a local MLA for a meeting. There is no indication contained in that request or the Council's planning file of the reason for the request or the matters to be dealt with. The meeting took place in January 2016 with the MLA, an ex-Councillor and the applicant's agent present. The case officer and senior

planning officer attended the meeting at Council offices. The planning file indicates that among other matters, 'resiting' was discussed. Subsequently amended plans which moved the main dwelling by 16 metres were submitted by the agent for the applicant in April 2016.

20. I have reviewed the Development Management Officer Report ('the report') setting out the analysis of the application with a recommendation for approval. The report contains details of the characteristics of the site; assessment of planning policy and other material considerations; and recommendations.

21. I note the following extracts in consideration of relevant policy issues:

'While I do have some concerns regarding the reconfiguration of curtilage² the applicant has stated that the outbuildings form part of his father's farm holding... Ordinarily I would not accept such a proposal, however based on the unusual requirement to retain the existing outbuildings separately from the replacement dwelling (as these will not form part of the curtilage), combined with the fact that the new dwelling is positioned a short distance forward of the existing dwelling, I am of the opinion that this could be acceptable.

...

Due to the positioning and orientation of the dwelling combined with the lack of gable first floor windows it is my opinion that the proposed dwelling will not significantly impact on adjacent properties in terms of overshadowing, loss of light or overlooking / privacy.

...

In my opinion the proposal generally complies with policy, recommend approval.'

I note that the report, dated 17 May 2016, recommended approval of the planning application.

² An area of land associated with a house and forming one enclosure with it. The term is not defined in law but is a matter of professional planning judgement in each case.

22. Under the scheme for delegation of planning functions, the decision on an application may be delegated to a Senior Planning Officer. In this case a meeting to discuss the application was held on 17 May 2016. The decision taken at the development management group meeting was to approve the planning application. The planning approval was issued on 3 June 2016.

Council's response to investigation enquiries

23. During the investigation, the investigating officer directed detailed enquiries to the Council. In response to these enquiries, the Council reiterated the position it had taken when dealing with the complaint. This was as follows: (i) that initial neighbour notification and advertisement had taken place which are legislative requirements; (ii) re-advertisement and re notification were considered by the case officer on receipt of the amended plans; (iii) re-advertisement was not required; and (iv) the Council apologised that re-notification of the amended plans to the complainant should have taken place. The Council took the opportunity to clarify several errors in recorded dates contained in the original planning file. The Council also provided a copy of an amended checklist and guidance. This guidance was developed to assist Council staff in addressing re-notification and re-advertisement.

Analysis and Findings

24. The Department of Infrastructure ('the Department') has developed Development Management Practice Notes which state as follows:
- '... designed to guide planning officers and relevant users through legislation and deals primarily with procedures as well as good practice. The new practice notes stem from the Planning Act (Northern Ireland) 2011 and any related subordinate legislation. The emphasis is very much on advice, but where explicit legislative requirements must be followed these will be made clear.'*³

³ See <https://www.planningni.gov.uk/index/advice.htm>

25. This complaint focuses on the Council’s determination of potential re-notification and re-advertisement of the amended plans. The Council considered this was one of the considerations as part of the processing of the planning application. The planning file evidences that issues of: design; layout; access; and responses to statutory consultations were all considered and acted upon by the Council. The planning file holds evidence of the Council’s consideration of these issues as part of the process.
26. I note that Practice Note 14 states clearly that comments from the public and seeking to engage public awareness of applications by advertisement and notifications are ‘*important considerations*’.
27. In the consideration of this complaint, where no re-notification or re-advertisement of the amended plans took place, the record on the planning file of particular relevance is a pro-forma single page titled ‘Amended Plans/Additional Information’ (Amendment Pro-Forma). This page when added to the planning files denotes the receipt of amended plans. It is clear that this record involves the interaction of administrative and professional planning staff in tasks associated with processing the amended plans. Under a heading ‘P&T’ (Professional and Technical) the form layout is:

Re-advertisement Required? YES/NO	Description amended? YES/NO
Re-notify Neighbours/Objectors? YES/NO	
Please return to DCO to consult/re-consult:	

28. It is noted on this document that the relevant questions ‘*Re-advertisement Required?*’ and ‘*Re-notify Neighbours/Objectors?*’ are both answered ‘NO’, by circling, in respect of the amended plans in this case.
29. I note that in the Council responses the complaint the following explanations were provided:

'At this point you should have received further notification to allow you to consider the amendments if you chose to do so. I apologise that due to a processing error this did not happen.' (Stage 1 response)

'...I acknowledge that there was an error in processing of this application...I can only apologise once more for this oversight and assure you that measures have been taken to ensure such a shortcoming does not reoccur.' (Stage 2 response)

'In this case, it was judged that having regard to the nature of the application for a single replacement dwelling in the countryside and the limited scale of the amendment, which involved relocation of siting by approximately 16 metres within the same site, the change was not so substantial to require re-advertisement. Furthermore, regard was had to the fact that no public representations had been received...My staff exercised their judgement in reaching the decision that the change to the application was not substantial to warrant re-advertisement.' (Stage 3 response)

30. I consider that the Council has sought to justify the lack of re-notification of the amended plans to the complainant as a 'processing error'. In my view that mis-states what occurred. This was not a case of an oversight or error in an instruction or mistake in circling or ticking the wrong box. The failure was in a decision by a planning officer.
31. The Amendment Pro-forma highlighted above exhibits that the case officer completing the responses to the questions, formed a decision not to re-neighbour notify and not to re-advertise at that point in April 2016. There is no record on the planning file of any relevant considerations taken into account in arriving at those decisions. However, in response to the complaint the Council has accepted that the decision not to re-notify was wrong and not 'good administrative practice'.

32. The absence of any record of the factors considered in arriving at the decision not to re-notify clearly contravenes the requirements of para 4.11 in Practice Note 14. The relevant case law cited in the Practice Note has been reiterated by the Court of Appeal in Northern Ireland in a 2007 planning case⁴:
33. The Council's decision not to re-advertise the amended plans was a decision taken by a planning officer. This decision was evidenced by circling 'NO' on the Amendment Pro Forma. There is no separate record of the factors considered in arriving at this decision.
34. The Council correctly stated in reply to the complaint that 'there is a difference in the legal significance of legislation over guidance', I also consider that the first Principle of Good Administration requires public bodies such as the Council to 'Get it Right'. A copy of the Principles of Good Administration are included in the Appendix. In the context of this case 'Getting it Right' includes acting in accordance with published guidance; taking account of good practice and taking reasonable decisions based on all relevant considerations. I consider that the failures to document the consideration, to re-notify the complainant, and to document the decision making on re- advertisement amount to maladministration. I note there is no record on the planning or complaint file to support the assertion in the stage 3 complaint response to the complainant that:

'In this case, it was judged that having regard to the nature of the application for a single replacement dwelling in the countryside and the limited scale of the amendment, which involved relocation of siting by approximately 16 metres within the same site, the change was not so substantial to require re-advertisement. Furthermore, regard was had to the fact that no public representations had been received...My staff exercised their judgement in reaching the decision that the change to the application was not substantial to warrant re-advertisement.' (Stage 3 response)

⁴ Re HM's (a minor) Application for Judicial Review [2007] NICA 2 (16 January 2007)
<http://www.bailii.org/nie/cases/NICA/2007/2.html>

35. There is no contemporaneous record of any discussions or considerations that took place in relation to the Council's decision not to re-notify or re-advertise, or any decisions made in that regard. In consideration of this issue I refer to the third Principle of Good Administration: which requires public bodies to be 'open and accountable'. This principle underscores the need for records of decisions to be created and maintained. This is a key tenet of good administration. To comply with this principle adequate and contemporaneous records must be completed of matters considered by the public body, decisions made and the reasons for the decisions including weight given to relevant evidence. Records can act as a 'shield' for a public body to defend its actions when challenged. I am satisfied that these failures amount to maladministration. It is clear that the ability of an individual to comment, make representations or object to a planning application requires the planning authority to evidence the consideration of the Council regarding re-notification and re-advertisement to bring amended plans to the wider attention of those potentially concerned.
36. I would also comment that I consider that the planning file does not contain appropriate or adequate records to reflect that the meeting requested by a local MLA and which took place on 28 January 2016 was in accordance with the Council policy under the 'Delegated Officer Determination Process'⁵. The request was from an MLA who do not fall within the stated policy; there was no indication of the party if any that the MLA wished to support or assist; and there was no record of the reasons for granting the meeting.
37. The Council has failed to act in accordance with the first (acting in accordance with its own policy) and third (keeping proper and appropriate records) principles of Good Administration as outlined above in dealing with the request for a meeting. I consider that this amounts to maladministration.

⁵ <https://www.causewaycoastandglens.gov.uk/live/planning/development-management/planning-committee-determination-process>

38. As a consequence of the maladministration identified I consider the complainant has suffered the injustice of frustration, anger, uncertainty, as well as the time and trouble in pursuing her complaint to my office. She also experienced the lost opportunity of making representations to the Council and having her views considered.
39. Although the complainant lost the opportunity to make representations or object to the planning application in consequence of the Council's maladministration, I am unable to conclude that this application would have been refused. The question of the final positioning of the dwelling within the wider application site would have been a 'live' issue if the complainant had been able to make representations or object.
40. In considering the question of remedy I have taken account of the Principles of Remedy cited above. I deal with the appropriate remedy in the conclusion of this report.
41. Since the Council's action in relation to the 2015 application was attended by maladministration, I can consider the merits of its decisions in this regard. The failure to re-notify or re-advertise amendments to the 2015 application resulted in the complainant losing an opportunity to comment on an amendment which brought a replacement building some 16 metres closer to her property. In light of the significant failings and considering the actual amended plans, I have cause to question the merits of the decision.
42. The Council and the complainant were provided with a draft of this report as part of the investigation. I received substantive comments from the Council which focused on my findings on the recording of the meeting with the MLA and my proposed remedy for the maladministration resulting from my lack of confidence in the planning decision. I have considered the Council comments and sought further information from an experienced planner who acted as an Independent Professional Advisor. As a result of the advice received I adjusted my recommendations for remedy from my draft report.

43. The independent advice outlined the relevant planning considerations and advised:

“However when assessing what was approved and has been built, I consider determining weight has to be attached to :-

- *the proximity of the original dwelling to the boundary with No 79;*
- *the reasonable compliance of the new siting with Policy CTY3 as an in-situ replacement;*
- *general compliance with the broad design criteria identified ... There is no significant overlooking or overshadowing of No 79 and the residential amenity of the dwelling and its private rear garden is largely unaffected.*

The combination of these elements of the assessment outweigh concerns regarding the dominance of part of the structure over a relatively short view, from the front of No 79. In this context I conclude that the planning decision was therefore reasonably based, albeit in the absence of public representations.”

44. In the independent professional planning advice I note that:

“It is possible that the process of re-advertisement and re-notification of the revised siting might have resulted in the dwelling being marginally relocated further from this boundary. A responsible Planning Officer, would have followed up any public representations resulting from re-notification of the application, and given the specific nature of the [complainant’s] objection, should at least have investigated the possibility of some relocation (even if only a marginal distance) with the applicant’s agent.” [Emphasis added]

45. I accept the professional planning advice in relation to the decision to approve the application. However, I also consider that the opportunity of the “possibility of relocation” is an element of the injustice sustained by the complainant.

CONCLUSION

46. I received a complaint about the actions of the Council regarding the processing of a planning application. In particular, the complaint focused on the

Council's failure to notify her of amended plans in relation to the application and the Council's response to her complaint about this issue.

47. I have investigated the complaint and have found maladministration in relation to the following matters:
- (i) The Council's failure to adequately consider the re-notification and re-advertisement of the amended plans to the application.
 - (ii) The Council's failure to give adequate reasons for decisions and maintain appropriate records of its consideration.
 - (iii) The Council's failure to deal with a request for a meeting from an MLA in accordance with its stated policy
48. I am satisfied that the maladministration I identified caused the complainant to experience the injustice of frustration, anger, uncertainty, as well as the time and trouble in pursuing her complaint to my office. She also experienced the lost opportunity of making representations to the Council and having her views considered in the processing of the application.

Recommendations for Remedy

49. Having considered the nature and extent of the injustice sustained by the complainant in consequence of the maladministration identified in this report, I recommend the following remedies:
- The Council Chief Executive should apologise for the failings identified in this report in accordance with my guidance on apology.
 - The complainant spent the sum of £510 on obtaining planning advice on the issue of the Council's failure to re-notify and re-advertise the application. I consider that that sum would not have been spent had the Council acted appropriately. I therefore consider that the Council should refund to the complainant the £510 spent on planning advice

- The complainant should receive a payment of £2000 from the Council by way of consolatory payment for the injustice of frustration, anger, uncertainty and loss of opportunity to object to the proposal.

I recommend that the Council provide the apology, refund of fees and the consolatory payment within **one** month from the date of my final report.

50. In order to improve the Council's delivery of the planning function, I also recommend that:

- The relevant Council's planning officers should be reminded of the need to consider re-notification and re-advertisement in appropriate cases, the relevant considerations involved in making those decisions and the need to make proper contemporaneous records of such decisions. The Council should reinforce the guidance in Practice Note 14 and their own internal advice and guidance note.
- The relevant Council planning officers should have training in good record keeping.

51. I recommend that the Council implement an action plan to incorporate these recommendations and should provide me with an update within six months of the date of my final report. That action plan should be supported by evidence to confirm that appropriate action has been taken (including, where appropriate, records of any relevant meetings, training records and/or self-declaration forms which indicate that staff have read and understood any related policies).

The Council have accepted my recommendations.

Marie Anderson

MARIE ANDERSON
Ombudsman

April 2019

APPENDIX ONE

PRINCIPLES OF GOOD ADMINISTRATION

Good administration by public service providers means:

1. Getting it right

- Acting in accordance with the law and with regard for the rights of those concerned.
- Acting in accordance with the public body's policy and guidance (published or internal).
- Taking proper account of established good practice.
- Providing effective services, using appropriately trained and competent staff.
- Taking reasonable decisions, based on all relevant considerations.

2. Being customer focused

- Ensuring people can access services easily.
- Informing customers what they can expect and what the public body expects of them.
- Keeping to its commitments, including any published service standards.
- Dealing with people helpfully, promptly and sensitively, bearing in mind their individual circumstances
- Responding to customers' needs flexibly, including, where appropriate, co-ordinating a response with other service providers.

3. Being open and accountable

- Being open and clear about policies and procedures and ensuring that information, and any advice provided, is clear, accurate and complete.
- Stating its criteria for decision making and giving reasons for decisions
- Handling information properly and appropriately.
- Keeping proper and appropriate records.
- Taking responsibility for its actions.

4. Acting fairly and proportionately

- Treating people impartially, with respect and courtesy.

- Treating people without unlawful discrimination or prejudice, and ensuring no conflict of interests.
- Dealing with people and issues objectively and consistently.
- Ensuring that decisions and actions are proportionate, appropriate and fair.

5. Putting things right

- Acknowledging mistakes and apologising where appropriate.
- Putting mistakes right quickly and effectively.
- Providing clear and timely information on how and when to appeal or complain.
- Operating an effective complaints procedure, which includes offering a fair and appropriate remedy when a complaint is upheld.

6. Seeking continuous improvement

- Reviewing policies and procedures regularly to ensure they are effective.
- Asking for feedback and using it to improve services and performance.
- Ensuring that the public body learns lessons from complaints and uses these to improve services and performance.