

PERTH AND KINROSS COUNCIL

Scrutiny Committee

8 February 2017

COUNCIL COMPLAINTS PERFORMANCE REPORT FOR 2015/16

Report by Head of Legal & Governance Services

PURPOSE OF REPORT

To provide the Scrutiny Committee with assurance that the Council has an adequate and effective Complaints Handling Procedure (CHP) in place.

To satisfy public performance reporting requirements in accordance with the Scottish Public Services Ombudsman's performance measures for Local Authorities.

1. EXECUTIVE SUMMARY

- 1.1 The Council's Complaints Handling Procedure is appropriate and effective; performance is within acceptable limits and in line with the Scottish Public Services Ombudsman's (SPSO's) requirements.
- 1.2 The subject matter of complaints does not identify any particular trend or pattern that indicates a particular risk within any specific service or illustrate a corporate issue or concern.
- 1.3 The number of complaints received in the year increased by 21%. Leaving aside an increase in "missed" bin reports (which the SPSO class as a complaint) the increase is due to better and more accurate recording of complaints in schools following training.
- 1.4 Data gathered through the CHP and provided by the SPSO shows that :-
 - 95.5 % of complaints received were resolved at Stage 1 of the CHP
 - 3% of complaints were resolved at Stage 2 of the CHP
 - 1.5% of total complaints progressed to the SPSO for consideration
 - Of the 1.5% (42 cases) which were progressed to the SPSO only 2 resulted in the complaints being upheld in full or in part. This represents 0.08% of all complaints received in the year.
- 1.5 72% of Stage 1 complaints were processed within the 5 day timescale as compared with 80% in 2014-15. This is due to the increase in volume and complexity of complaints received. The average processing time is 4 days.
- 1.6 58% of Stage 2 complaints were processed within the 20 day timescale. The same as 2014-15. The average processing time reduced from 24 to 22 days.

- 1.7 A feedback Survey was issued to all Stage 2 complainants, but the response rate was poor (10%) and the results were considered inconclusive.
- 1.8 Recommendations from Stage 2 complaints resulted in additional training being given on 24 occasions and new or amended procedures being implemented on 11 occasions.

2. BACKGROUND

- 2.1 The CHP was introduced on 1 April 2013 and is based on the model developed by the SPSO in conjunction with all Scottish Local Authorities. It seeks to resolve as many complaints as possible at the point of delivery and reflects the Council's commitment to valuing complaints as a means of identifying areas for service improvement.
- 2.2 The CHP is a 2 stage procedure. If an individual remains dissatisfied at the conclusion of Stage 2 of the CHP, he or she can refer the complaint to the SPSO.
- 2.3 The CHP does not cover Social Work complaints as there is a separate statutory complaints procedure for these. Accordingly, these complaints are not included in this report. Following a change in legislation as of April 2017, these complaints will come under the CHP and will therefore be reported on in the report from 2017/18 onwards.
- 2.4 As the CHP seeks to resolve complaints at the point of service delivery, individual Services are responsible for responding to complaints and issuing their own findings. To ensure consistency across the organisation, the Corporate Complaints Team conducts a quality assurance review of each complaint scope and final response.
- 2.5 Good practice is shared through the Local Authority Complaints Handlers Network, established in conjunction with the SPSO, which meets regularly and all Service complaint co-ordinators are given the opportunity to attend.
- 2.6 National recording and reporting systems have been established and performance indicators have now been agreed. It is expected that these performance indicators will allow Local Authorities to benchmark, identify and address emerging trends.
- 2.7 Further information on the Complaints Handling Procedure can be found [here](#).

3. PERFORMANCE INDICATORS

- 3.1 The SPSO, in conjunction with local authorities, has developed eight high-level performance indicators against which local authorities should assess and monitor their complaints handling performance. The Council is required to publish complaints performance information using these indicators on a quarterly basis. The Council's figures for these indicators for 2015/16 are shown in Appendix 1.

- 3.2 A complaint is defined as “an expression of dissatisfaction by one or more members of the public about the local authority's action or lack of action, or about the standard of service provided by or on behalf of the local authority”.
- 3.3 It should be noted that “missed” bin uplifts are considered by the SPSO to satisfy the definition of a complaint and, consequently, have to be included in the total number of complaints.
- 3.4 Anecdotal evidence suggests that in the majority of these “missed” bin complaints the customer had simply failed to put their bin out for collection, but it is not possible to differentiate between those and genuine service failures which would actually merit being classed as complaints. Given that all “missed” bin complaints are dealt with by simply instructing a further uplift, as complaints they have 100% stage 1 resolution.

4. SPSO INFORMATION

- 4.1 The Scottish Public Services Ombudsman Act 2002 and the Public Services Reform (Scotland) Act 2010 give the Scottish Public Services Ombudsman (SPSO) the authority, in defined circumstances, to investigate complaints about Scottish public authorities, including local authorities.
- 4.2 The SPSO reports on complaints in two different ways. If he considers that a complaint he has investigated is of national significance he lays the report before the Scottish Parliament. All other complaints are reported by decision letters sent to public authorities and published on the SPSO website; they can be found at <http://www.spsso.org.uk/our-findings> The SPSO did not lay any reports before the Scottish Parliament in relation to Local Authorities during 2015/16.
- 4.3 The SPSO received a total of 56 complaints in respect of the Council in 2015/16. Of these cases, 42 had been dealt with under the CHP. The SPSO could not consider the other 16 complaints as these were premature. Of the 42 complaints the SPSO could consider, he determined :-
- 11 were not duly made or were withdrawn
 - 7 sought an outcome which was not achievable
 - 17 were outwith SPSO jurisdiction
 - 1 was resolved in the interim by the Council

The remaining 6 were fully investigated with the following outcomes:-

- 1 complaint fully upheld – 5 recommendations
 - 1 complaint partially upheld – 2 recommendations
 - 4 complaints not upheld
- 4.4 A summary of the SPSO's dealings with the Council in the year 2015/16 is shown in Appendix 3.

- 4.5 A note of the recommendations received by the SPSO is shown in Appendix 4.
- 4.6 The SPSO also publishes summarised information about complaints received about local authorities. The information for 2015/16 is shown in Appendix 5.
- 4.7 For local authorities overall, the SPSO issued 891 decision letters compared to 898 from the previous year and did not issue any reports during 2014/15 or 2015/16.

5. CUSTOMER FEEDBACK

- 5.1 The SPSO requires an indicator of customer satisfaction with the CHP. A survey was piloted for Stage 2 complainants as these complaints are centrally co-ordinated. 54 survey questionnaires were issued with a response received from 7 (13%) Of those who responded 75% expressed dissatisfaction. As this only represents approx. 10% of the survey group, the data was considered inconclusive.
- 5.2 The validity of a Stage 2 survey is questionable as, at that stage, the individual is dissatisfied not with necessarily the process, but with the fact that they have not received their desired outcome. The SPSO statistics evidence the fact that where cases can be resolved, in the main they are done so within the CHP. Where they are not, the SPSO statistics also evidence that in very few cases, any alternative outcome for the customer is possible (NB: only 2 cases out of 2631 resulted in any further SPSO recommendations).
- 5.3 If the customer is dissatisfied with the outcome of their complaint and expresses this in a feedback mechanism, the statistical evidence would therefore suggest that any such feedback would serve no purpose in terms of improving the CHP or the customer experience as the outcome of the complaint would unlikely be different.
- 5.4 As Stage 1 complaints are dealt with at the point of service and in many cases are resolved by informal means to provide a quick resolution for the customer, using a survey to gain customer feedback may not be the most effective mechanism. Consideration needs to be given as to how meaningful customer feedback can be obtained.

6. PROPOSALS

- 6.1 The Corporate Complaints Group will continue to review the CHP throughout the year to ensure that the process and procedure remains adequate and fit for purpose.
- 6.2 The Corporate Complaints Team will continue to provide a range of training for staff who deal with complaints to support them to effectively resolve matters at stage 1. Should any complaint outcome identify a need for more focussed training this will be provided as required.

- 6.3 The Corporate Complaints Team will work to identify a more effective mechanism for measuring customer feedback.

7. CONCLUSION AND RECOMMENDATIONS

This is the third report in regard to the Councils Complaints Handling Procedure.

It is recommended that the Scrutiny Committee:

- (i) Consider and comment on this report.
- (ii) Note that the performance of the CHP will continue to be monitored and reviewed throughout the year.
- (iii) Note that further work is to be undertaken to assess customer satisfaction with the CHP

Author(s)

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Approved

Name	Designation	Date
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1. IMPLICATIONS, ASSESSMENTS, CONSULTATION AND COMMUNICATION

Strategic Implications	Yes / None
Community Plan / Single Outcome Agreement	No
Corporate Plan	No
Resource Implications	
Financial	No
Workforce	No
Asset Management (land, property, IST)	No
Assessments	
Equality Impact Assessment	No
Strategic Environmental Assessment	No
Sustainability (community, economic, environmental)	No
Legal and Governance	No
Risk	No
Consultation	
Internal	Yes
External	No
Communication	
Communications Plan	No

1. Strategic Implications

Community Plan / Single Outcome Agreement - N/A

Corporate Plan - N/A

2. Resource Implications

Financial - N/A

Workforce - N/A

Asset Management (land, property, IT) – N/A

3. Assessments

Equality Impact Assessment – N/A

Strategic Environmental Assessment – N/A

Sustainability – N/A

Legal and Governance – N/A

Risk – N/A

4. Consultation

Internal

- 4.1 This report has been reviewed by the Policy and Governance Group and the Corporate Complaints Group. Both comprise representatives from all Services.

External – N/A

5. Communication

None

2. BACKGROUND PAPERS

None

3. APPENDICES

Appendix 1 – SPSO Performance Indicators

Appendix 2 - What was complained about?

Appendix 3 – SPSO decision letters

Appendix 4 - Recommendations made by the SPSO in 2015/16

Appendix 5 – Local Authority Complaints received by the SPSO in 2015/16

SPSO PERFORMANCE INDICATORS

Indicator 1 - The total number of complaints received per thousand of the population.

This indicator records the total number of complaints received by the Council. The 2011 Census gives the population of the Council area to be approximately 148,000.

Year	Total number of complaints received	Total complaints closed at Stage 1	Stage 1 escalated to Stage 2	Total number of complaints closed	Number of complaints per 1,000 population
2015/16	2631	2513	118	2631	18
2014/15	2185	2085	100	2185	15

For information, the figures excluding “missed bin complaints are as follows: -

Year	Total number of complaints received	Total complaints closed at Stage 1	Stage 1 escalated to Stage 2	Total number of complaints closed	Number of complaints per 1,000 population
2015/16	1450	1332	118	1450	10
2014/15	1203	1103	100	1203	8

The comparable figures for “missed” bin complaints are: -

Year	Total number of complaints received	Total closed at Stage 1	Stage 1 escalated to Stage 2	Total number of complaints closed	Number of complaints per 1,000 population
2015/16	1181	1181	0	1181	8
2014/15	982	982	0	982	7

The term “closed” refers to a complaint to which a customer has had a response and no further action is required or process available within the Council’s CHP.

Indicator 2 - Complaints closed at Stage 1 and Stage 2 as a percentage of all complaints closed.

Year	Total number of complaints closed	Stage 1 complaints closed as a % of all complaints	Stage 2 complaints closed as a % of all complaints
2015/16	2631	95.5% (2513)	4.5% (118)
2014/15	2185	95% (2085)	5% (100)

Indicator 3 - The number of complaints upheld, partially upheld or not upheld at each stage as a percentage of complaints closed in full at each stage.

This indicator records the formal outcome recorded for each complaint. Stage 1 complaints generally have one point of complaint whereas Stage 2 complaints generally have multiple points.

Complaints closed at Stage 1

Year	Number of complaints closed	% upheld	% partially upheld	% not upheld	% no conclusion**
2015/16	2513*	62% (1554)	9% (231)	27% (686)	2% (42)
2014/15	2085*	60% (1238)	10% (208)	24% (505)	6% (134)

*These figures include 1181 missed bin uplifts for 2015/16 and 982 for 2014/15. It should be noted that there are in excess of 5 million bin lifts carried out successfully every year.

** A complaint may be recorded as “no conclusion” when there are two differing opinions on an issue and no independent witnesses.

Complaints closed at Stage 2

Year	Number of complaints closed	% upheld	% not upheld
2015/16	118	60% (71)	40% (47)
2014/15	100	63% (63)	37% (37)

The SPSO indicator as detailed above requires that an overall outcome is recorded for each complaint. If any aspect of the complaint is upheld then the overall outcome is recorded as “upheld”. By way of explanation, if a complaint comprises five points, of which two are upheld, two not upheld and one partially upheld, then the overall outcome would be upheld.

The table below shows a breakdown of findings in respect of each complaint point at stage 2 consideration.

Stage 2	Number of complaints closed	Number of points within complaints	% points of complaint points upheld	% points of complaint points partially upheld	% points of complaint points not upheld	% No conclusion **
2015/16	118	495	14% (71)	11% (54)	71% (352)	4 % (18)
2014/15	100	407	20% (81)	11% (45)	61% (248)	8 % (33)

Indicator 4 - The average time, in working days, for a full response to complaints at each stage.

This indicator represents the average time in working days to close complaints at Stage 1 and at Stage 2.

SPSO procedures specify Stage 1 complaints to be resolved within 5 working days.

Stage 1	Number of Complaints.	Total number of working days taken to close complaints	Average time to respond to complaints
2015/16	2513	8865	4 days
2014/15	2085	8504	4 days

SPSO procedures specify Stage 2 complaints should be resolved within 20 working days.

Stage 2	Number of Complaints.	Total number of working days taken to close complaints	Average time to respond to complaints
2015/16	118	2533	22 days
2014/15	100	2392	24 days

Indicator 5 - The number and percentage of complaints, at each stage, which were closed in full within the set timescales of 5 and 20 working days.

This indicator presents the number and percentage of complaints closed within 5 working days at Stage 1 and 20 working days at Stage 2.

Stage 1	Number of complaints closed	Number of complaints closed within 5 working days	Number of complaints closed within 5 working as % of complaints closed
2015/16	2513	1816	72%
2014/15	2085	1664	80%

Stage 2	Number of complaints closed	Number of complaints closed within 20 working days	Number of complaints closed within 20 working days as % of complaints closed
2015/16	118	69	58%
2014/15	100	58	58%

Indicator 6 - The number and percentage of complaints, at each stage, where an extension to the 5 or 20 working days timeline has been authorised.

The Council's CHP allows for an extension to the timescales to be authorised in certain circumstances. An example would be where a key member of staff is on annual leave or when during school holidays.

Stage 1	Number of complaints closed	Number of complaints closed where an extension had been authorised	Number of complaints closed as % of all complaints closed where an extension had been authorised
2015/16	2513	697	28%
2014/15	2085	421	20%

Stage 2	Number of complaints closed	Number of complaints closed where an extension had been authorised	Number of complaints closed as % of all complaints closed where an extension had been authorised
2015/16	118	49	42%
2014/15	100	42	42%

Indicator 7 - A statement to report customer satisfaction with the complaints service.

A Complaints Handling Customer Feedback Survey commenced on 1 April 2016 and has been issued to date to a total of 54 Stage 2 complainants. Seven (13%) responses have been received of which 75% of respondents were not happy overall with the way that the Council handled, responded and resolved their complaints.

However, as this represents less than 10% of the stage 2 complainants, this is not considered to indicate any systemic problem.

Indicator 8 - A statement outlining changes or improvements, to services or procedures, as a result of the consideration of complaints.

This qualitative indicator is intended to identify service improvements/learnings from complaints that were derived from complaints during the reporting period.

The Council aims to record all service improvements arising from complaints. Complaints performance information, including improvement actions, are considered routinely at Departmental Management Team meetings and as part of Head of Service ERD's.

In the 118 stage 2 complaints recorded in 2015/16:-

- 24 recommendations were made highlighting the need for additional staff training on processes or procedures, which were accepted and implemented by the Services.
- 25 recommendations were made highlighting the need to review Council and Service policies and procedures. These were accepted by Services and new procedures were initiated in 11 cases.
- The Council is keen to understand the types of “expressions of dissatisfaction” being received and records the types of complaints received under the seven headings agreed by the SPSO. This approach provides the opportunity for identifying emerging trends and pinpointing areas for staff development and training. This information is detailed within Appendix 2

WHAT WAS COMPLAINED ABOUT?

Complaints by Service

Stage 1	2014/15	2015/16
	Number (%)	Number (%)
Corporate & Democratic	16 (1)	22 (1)
Education & Children's Services	159 (8)	370 (15)
Housing & Community Care	401 (19)	417 (17)
The Environment Service	1509 (72)	1704 (67)
Total Stage 1	2085 (100%)	2513 (100%)

Stage 2	2014/15	2015/16
	Number (%)	Number (%)
Corporate & Democratic	8 (8)	10 (8)
Education & Children's Services	29 (29)	32 (27)
Housing & Community Care	25 (25)	29 (25)*
The Environment Service	38 (38)	47 (40)
Total Stage 1	100 (100%)	118 (100%)

*Includes 3 that were subsequently withdrawn

Complaints by Category

Stage 1	2014/15	2015/16
	Number (%)	Number (%)
Missed Bins	982 (47)	1181 (46)*
Service Provision	502 (23)	591 (24)
Employee	209 (10)	247 (10)
Policy & Procedure	105 (5)	154 (6)
Communication	123 (6)	159 (6)
Equality	2 (1)	3 (1)
Other	162 (8)	178 (7)
Total Stage 1	2085 (100%)	2513 (100%)

*It should be noted that there are in excess of 5 million actual bin lifts carried out successfully every year.

Stage 2	2014/15	2015/16
	Number (%)	Number (%)
Service Provision	63 (63)	69 (58)
Employee	8 (8)	10 (9)
Policy & Procedure	25 (25)	27 (23)
Communication	2 (2)	4 (3)
Equality	0 (0)	0 ()
Other	2 (2)	8 (7)
Total Stage 2	100 (100%)	118 (100%)

SPSO DECISION LETTERS

SPSO Ref.	Description	Complaints	Complaint Points	Complaint Points Upheld
N/A	Complaints to the SPSO not duly made or withdrawn	11	11	0
N/A	Outcome of complaints not achievable by the SPSO	7	7	0
N/A	Out of SPSO jurisdiction (discretionary)	8	8	0
N/A	Out of SPSO jurisdiction (non-discretionary)	9	9	0
N/A	Resolved	1	1	0
N/A	Premature complaints to SPSO	14	14	0
201306027	TES – Enforcement Issues	1	5	0
201401233	HCC – Tenancy Issues	1	3	0
201402322	TES – Planning Application	1	1	0
201405142	ECS – Campus Issues 5 Recommendations	1	1	1
201407057	ECS – School Issues	1	2	0
201501727	TES – Road Issues 2 Recommendations	1	2	1
	Total	56	64	2

RECOMMENDATIONS MADE BY THE SPSO IN 2015/16

The table below lists the 7 recommendations made by the SPSO in regard to Decision Letters issued against the Council between April 2015 and March 2016.

Case Ref.	Complaint Description	Decision Issued	SPSO Recommendation	Council Action
201501727	<p>TES</p> <p>The Council failed to take reasonable steps when the complainant reported concerns about safe road access to the A911.</p> <p>Upheld by the SPSO</p> <p>The Council failed to take reasonable steps when you raised concerns about the premature removal of the old road.</p> <p>Not Upheld by the SPSO</p>	11/01/2016	<p>Recommendation 1</p> <p>The Council issue the complainant with an apology for the failings identified in his complaint.</p> <p>Date due: 11/02/2016</p> <p>Recommendation 2</p> <p>The Council should further ensure that the terms of the SPSO Decision Letter are brought to the attention of those members of staff in the Roads and Planning departments who were involved in the planning applications concerned.</p> <p>Date due: 11/02/2016</p>	<p>Apology letter sent.</p> <p>Date completed: 17/02/2016.</p> <p>Email with attached SPSO Decision Letter brought to the attention of staff.</p> <p>Date completed: 19/02/2016.</p>
201405142	<p>ECS</p> <p>The Council failed to take reasonable steps since December 2013 to address the complaints of continued noise nuisance.</p> <p>Upheld by the SPSO</p>	06/11/2015	<p>Recommendation 1</p> <p>The Council issue a written apology to the complainant for the failure to timeously issue an abatement notice in line with the relevant legislation.</p> <p>Date due: 04/12/2015</p> <p>Recommendation 2</p> <p>The Council ensure that relevant staff are aware of their statutory duties in terms of the requirement to serve abatement notices when a statutory nuisance is</p>	<p>The Council asked for an extension as officers wished to respond in detail regarding whether or not an abatement notice in line with the relevant legislation should have been issued.</p> <p>The Council rejected Recommendations 1 2 3 and 4</p>

Case Ref.	Complaint Description	Decision Issued	SPSO Recommendation	Council Action
			<p>confirmed.</p> <p>Date due: 04/12/2015.</p> <p>Recommendation 3 The Council actively investigate the noise from the campus that is affecting your property, including the antisocial behaviour aspect of swearing.</p> <p>Date due: 04/12/2015.</p> <p>Recommendation 4 The Council should consider on the basis of the established situation at the complainants home and without further delay, whether an abatement notice should be issued in line with the relevant legislation.</p> <p>Date due: 18/12/2015.</p> <p>Recommendation 5 The Council should consider whether there is any other formal action available to deal with audible swearing, if this issue persists.</p> <p>Date due: 18/12/2015</p>	<p>as officers did not agree that an abatement notice should have been issued.</p> <p>Response issued to the SPSO on 20/01/2016.</p> <p>SPSO stated that this view was incorrect in a letter dated 29 March 2016 and that the recommendations should now be implemented by the Council forthwith. Council accepted this decision.</p> <p>Recommendation 1 Apology letter from Chief Executive issued 6 May 2016, and a second letter of apology incorporating changes suggested by the SPSO issued 3 June 2016.</p> <p>Recommendation 2 Relevant staff verbally informed and issue discussed at Team meeting held on 24 June 2016.</p> <p>Recommendation 3 and 4 Although these recommendations were not originally accepted by the Council a range of measures had already been implemented by the</p>

Case Ref.	Complaint Description	Decision Issued	SPSO Recommendation	Council Action
				<p>time the Council agreed to fully implement Recommendations 3 and 4 including as follows;</p> <ul style="list-style-type: none"> • Reduction in teams on pitches at any one time • Facility opening times curtailed • Updated Management Plan • Further noise monitoring undertaken. <p>The noise monitoring showed that at this time there was no Statutory Noise Nuisance and subsequently a Noise Abatement Notice was not issued. However noise monitoring will continue when required.</p> <p>Recommendation 5 Agreed and measures implemented. However after discussions with all relevant staff approaches in terms of the Anti-Social Behaviour (Scotland) Act 2004 were deemed to be not appropriate for this set of circumstance.</p> <p>Date SPSO informed of actions undertaken and ongoing by the Council: 20/01/2016</p>

LOCAL AUTHORITY COMPLAINTS RECEIVED BY THE SPSO 2014/15

PKC Service	SPSO Category	PKC				All Local Authorities			
		Complaints to SPSO		%		Complaints to SPSO		%	
		14/15	15/16	14/15	15/16	14/15	15/16	14/15	15/16
Chief Exec / CS	Personnel	0	1	0	2.1	10	9	0.6	0.5
	Finance	3	4	6.4	8.5	174	179	9.3	10.4
	Legal & Admin	0	1	0	2.1	76	61	4.0	3.5
	Total	3	6	6.4	12.7	260	249	13.9	14.4
ECS	Education	8	7	17.1	15	174	173	9.3	10
	Recreation & Leisure	1	0	2.1	0	24	32	1.4	1.9
	Total	9	7	19.1	15	198	205	10.7	11.9
HCC	Housing	16	6	34.0	12.9	468	423	24.9	24.6
	Social Work	1	7	2.1	14.9	253	231	13.5	13.4
	Total	17	13	36.1	27.8	721	654	38.4	38
TES	Building Control	1	0	2.1	0	61	54	3.2	3.1
	Consumer Protection	0	0	0	0	8	4	0.4	0.2
	Env. Health & Cleansing	2	2	4.3	4.2	148	126	7.9	7.3
	Land & Property	1	1	2.1	2.1	29	20	1.5	1.2
	Planning	10	11	21.3	23.4	217	172	11.5	10
	Roads & Transport	3	4	6.4	8.5	119	120	6.3	7
	Economic Development	0	0	0	0	8	11	0.4	0.6
	Total	17	18	36.2	38.2	590	507	31.2	29.4
Fire & Police Boards		0	0	0	0	4	5	0.2	0.3
National Park Authorities		0	0	0	0	3	6	0.2	0.4
Other		0	1	0	2.1	21	17	1.1	1
Welfare Fund - Grants	Community Care & Crisis	1	0	2.1	0	26	40	1.3	2.3
Valuation Joint Boards		0	0	0	0	6	6	0.3	0.4
Subject Unknown or Out of Jurisdiction		0	2	0	4.2	51	33	2.7	1.9
Total		47	47	100	100	1880	1722	100	100