



LONDON BOROUGH OF  
**HARROW**

# Housing Services Complaints Report 2023-2024



## **1. Introduction**

The annual complaints report is a summary of performance and learning from residents' complaints, from 1 April 2023 to 31 March 2024. It includes:

- Stage 1 complaints
- Stage 2 complaints
- Councillor enquiries
- Member of Parliament (MP) enquiries
- Ombudsman investigations

This report provides an analysis of the complaints, compliments and comments received by the Council during 2023/24 under the housing complaints procedure, including landlord services complaints (council tenants and non-secure tenants in council housing), leaseholder complaints, and other housing complaints (e.g. residents, housing applicants, homeless applicants, homeless households in non-council housing). This report not only focuses on volume and timeliness of the responses but also aims, where possible, to identify themes and lessons learnt that result in service improvements. This is our 3rd complaints report since we first began publishing our complaints performance.

The approach to handling complaints within the policy, embedded the underlying principles as set out within the Housing Ombudsman Complaint Handling Code around accessibility, transparency, and fairness for our customers. Overall, this approach to complaint handling has resulted in a positive result regarding the level of formal complaints being logged. Within the new approach there is also an emphasis on early intervention and outcomes to make sure, wherever possible any issues and concerns are rectified and resolved at the earliest opportunity. This has provided colleagues the opportunity to take ownership, being accountable of issues and resolve them. The main drivers for complaints are around communication and delays in processes in making sure works are underway. In relation to communication there has been improvements in the way we communicate with our customers throughout the organisation.

## **2. Background**

Housing Services offer a diverse range of services to around 4,800 council tenant households and 1,200 leaseholders. These services are accessible through various channels, including online self-service, email, telephone calls, in-person interactions, and by post. We make sure that complaints related to our services can be received by any of these channels.

There are 2 stages to the Council's complaints process. If a complainant is dissatisfied at the first stage, they have the option to escalate their complaint to a senior manager as a stage 2 complaint. The complainant has the right to seek advice and assistance from the Housing Ombudsman or the Local Government and Social Care Ombudsman at any stage of their complaint.

We aim to address complaints raised by residents as promptly as possible. We adhere to the requirements of the Housing Ombudsman's Complaint Handling Code. This ensures that all complaints are dealt with by adopting the HO's dispute resolution

principles: handled fairly, put matters right, and learn from outcomes.

We aim to respond to service requests within 10 working days.

Our complaints policy and procedure underpin our approach to effective complaint handling.

### **3. Timescales**

We have reviewed our timescales to align with the Housing Ombudsman's Complaint Handling Code, first published in July 2020. From April 2023, our timescales for stage 1 complaints were revised from 15 working days to 10 working days. The Council continued to provide complaint and enquiry services throughout the period with residents able to submit a complaint via the webform, email, telephone or letter. Our priority is making sure one point of contact is in place through Access Harrow and Place Enquiries enabling customers to be provided with the information or advice they are seeking at first contact.

### **4. Achievements in 23/24**

Some key achievements related to our complaints are, we:

- Carried out self-assessment
- Reviewed complaints policy in line with the requirements of the Housing Ombudsman Complaint Handling Code
- Every Monday, weekly performance is published, and reminders are sent in advance to encourage colleagues to comply with timescales.
- Complex complaints are monitored every Friday.
- We continue to engage with Housemark and submit monthly data to help benchmark with other social housing providers.
- Codesigned complaints templates with input from residents.
- A workstream has been set up as part of the Housing Improvement Board to provide more emphasis on customer excellence
- Introduced quality assurance
- Rolled out Customer Excellence workshops to staff.

### **5. Highlights**

Some key headlines from complaints performance in 2023/34 are:

- The volume of stage 1 complaints increased by 27%
- The volume of stage 2 complaints increased by 12%
- Escalation rate from stage 1 complaint to stage 2 complaint is 18%
- We received 22 HO cases and 5 LGSCO cases
- The top three concerns for our residents which led to complaints were outstanding repairs, accommodation issues and communication.
- This year has seen a greater emphasis on quality assurance and closer monitoring on the quality of responses and complaint outcomes.
- Satisfaction survey rolled out to measure satisfaction of complaint handling.

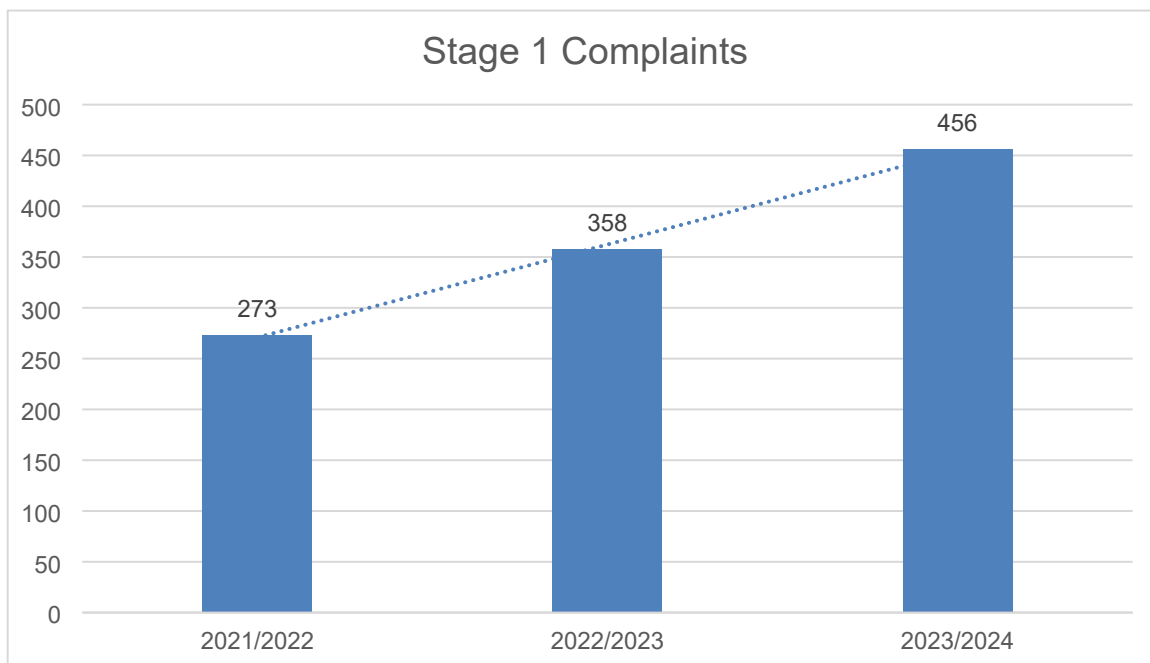
## 6. Complaints Analysis

### 6.1 Complaints received

Housing Services have received 1,364 complaints and enquiries during 2023/24, an increase of 29% since the same period last year (of which 1,058 complaints and enquiries were received in 2022/23), and a 67% increase since the same period 2 years ago (of which 817 complaints and enquiries were received in 2021/22). Of the 1,364 complaints and enquiries received this year, 40% are MP enquiries, 33% are stage 1 complaints, 21% are councillor enquiries, and 6% are stage 2 complaints.

### 6.2 Stage 1 (S1) complaints

Stage 1 complaints have increased steadily year by year – up 27% since 2022/23, and 67% since 2021/2022.



8% of the S1 complaints were recorded as upheld or partially upheld and 10% were recorded as not upheld. The vast majority (82%) of S1 complaints received were closed without an outcome.

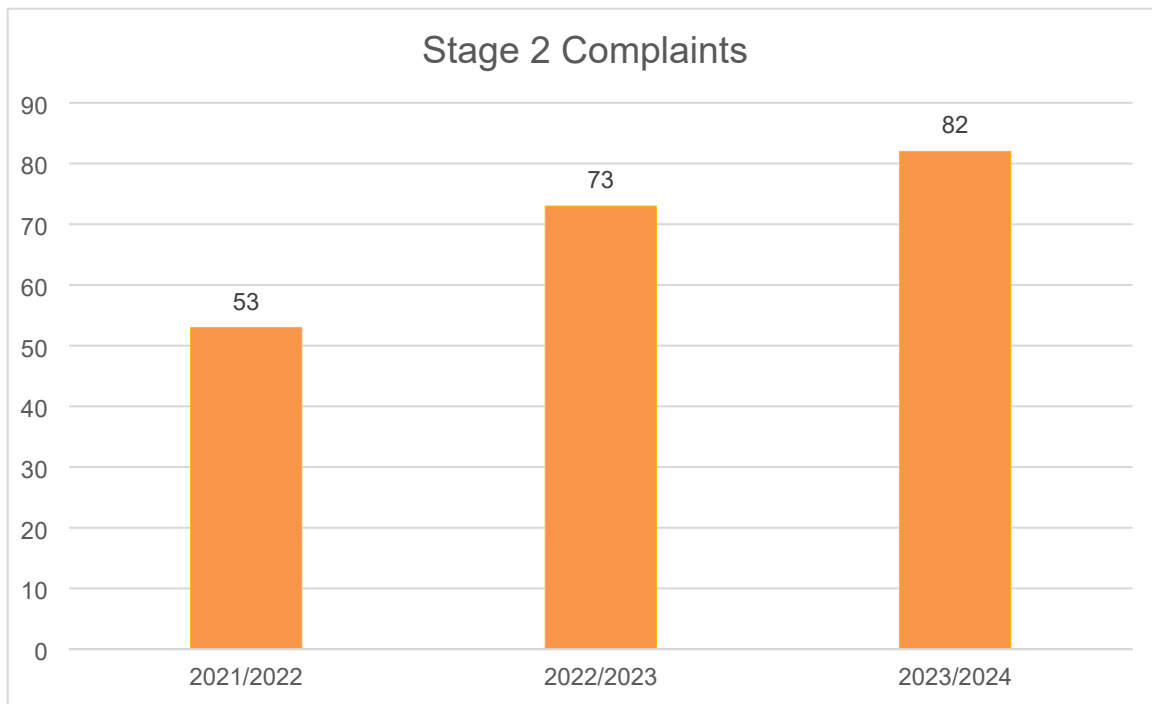
<b>Total S1 complaints 2023/2024</b>		<b>456</b>
S1 complaints responded to on time		370
S1 complaints upheld		13
S1 complaints partially upheld		23
S1 complaints not upheld		47
Upheld status unknown		373
% Responded to on time		81%

The top ten reasons for S1 complaints are similar to last year, with outstanding repairs, accommodation issues and services charges being the top reasons.

<b>Asset Management</b>	<b>Housing Needs</b>	<b>Resident Services</b>
Outstanding repair	Accommodation	Service charges
Bathroom	Locata	ASB
Leak	Homelessness	Staff conduct
Heating	Applications	Pest control
Lack of response	Damp / mould	Trees
Ceiling repair	Customer Service	Neighbour issues
Fence repair	Staff conduct	Fly tipping
Electrics	Bidding	Rehousing
Gas contractor	Banding	Rent arrears
Roof repair	Landlord rent issue	Gas checks

### **6.3 Stage 2 (S2) complaints**

Stage 2 complaints have also increased each year with an increase of 12% since 2022/23, and 55% since 2021/2022.



Of the 82 S2 complaints received this year, 12% were recorded as upheld or partially upheld. 6% were recorded as not upheld. The vast majority (82%) of S2 complaints received were closed without an outcome being recorded.

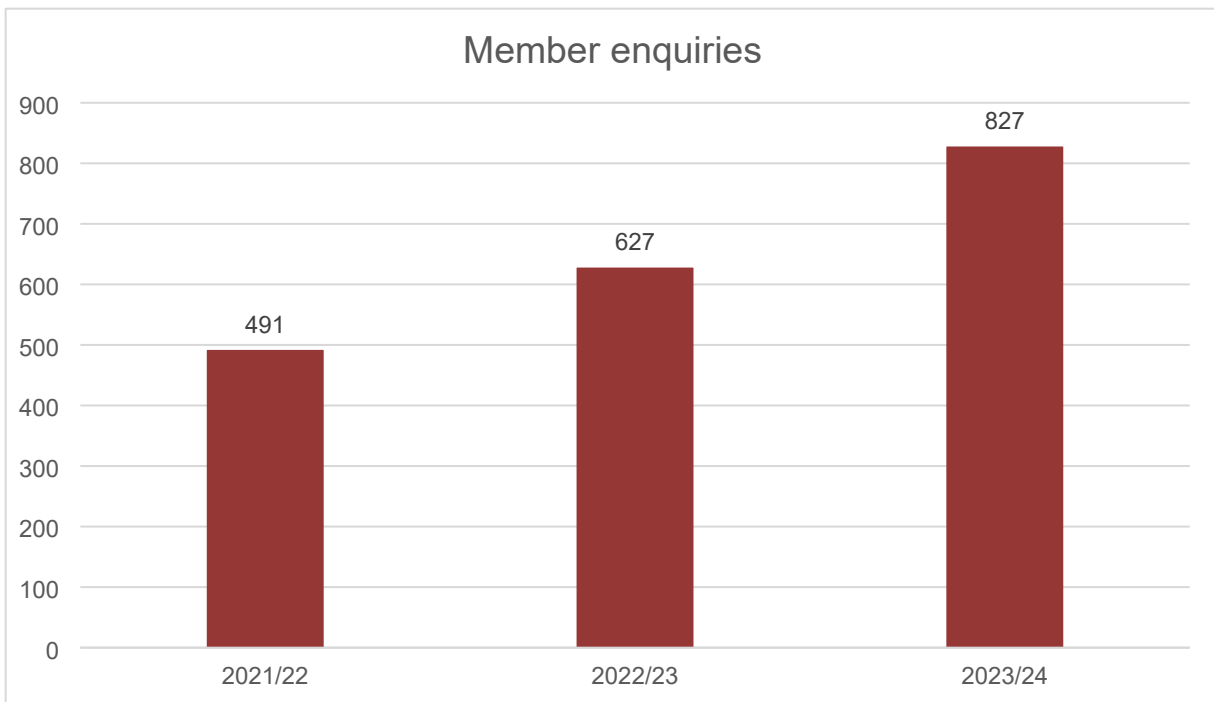
<b>Total S2 complaints</b>	<b>82</b>
S2 complaints responded to on time	62
S2 complaints upheld	7
S2 complaints partially upheld	5
S2 complaints not upheld	9
Upheld status unknown	61
% Responded to on time	76%

The top ten reasons for S2 complaints are also similar to last year, with outstanding repairs, accommodation issues and anti-social behaviour being the top reasons.

Asset Management	Housing Needs	Resident Services
Outstanding repairs	Accommodation	ASB
Communication	Customer Service	Communication
Disrepair	Staff conduct	Staff conduct

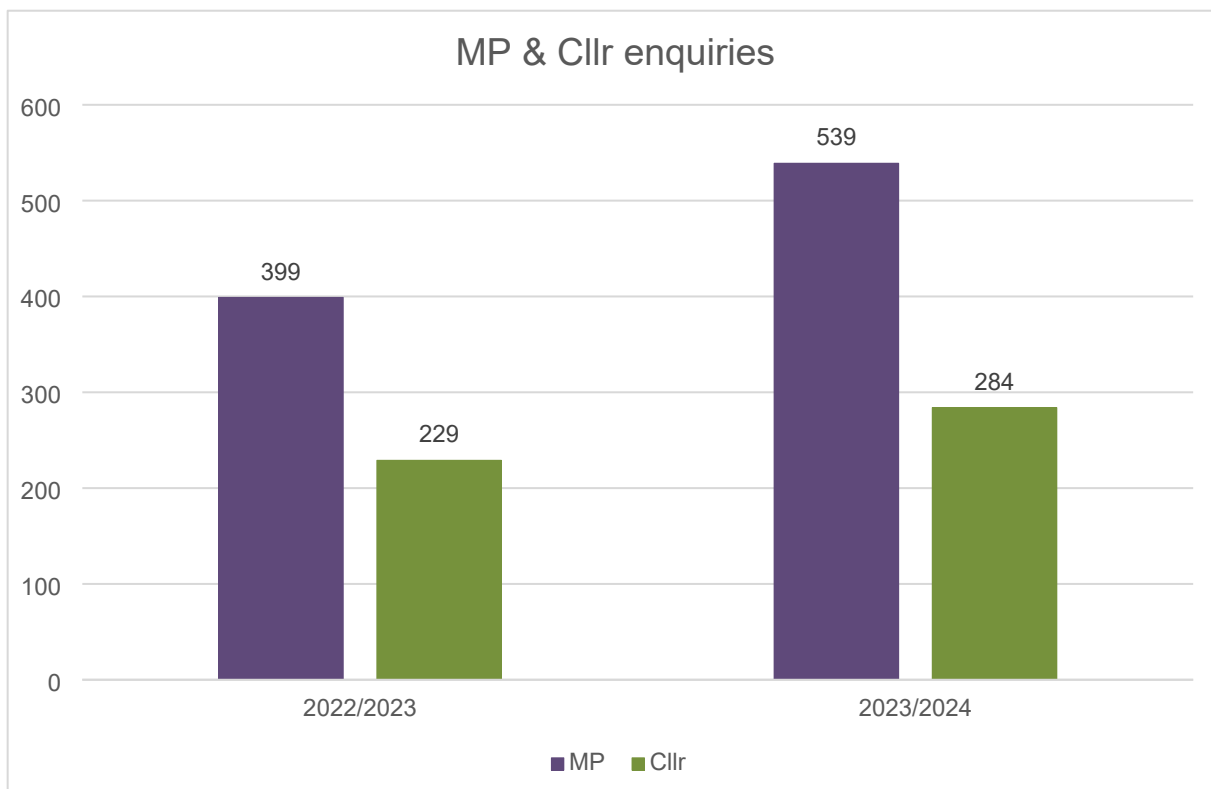
#### 6.4 Member Enquiries - Members of Parliament (MPs) and Council Members (Cllrs)

Member enquiries have increased each year, by 32% since 2022/23, and by 68% since 2021/2022. Member enquiries peaked during the years where an election took place, particularly in the last quarter of the year leading up to the election (January to March in 2022 and in 2024) as the total member enquiries accounted for 60% of all complaints and enquiries received during an election year, compared to 28% during 2022/2023 when there was no election.



The table below shows the MP enquiries and Cllr enquiries separately. The Housing Needs team receive the most member enquiries.



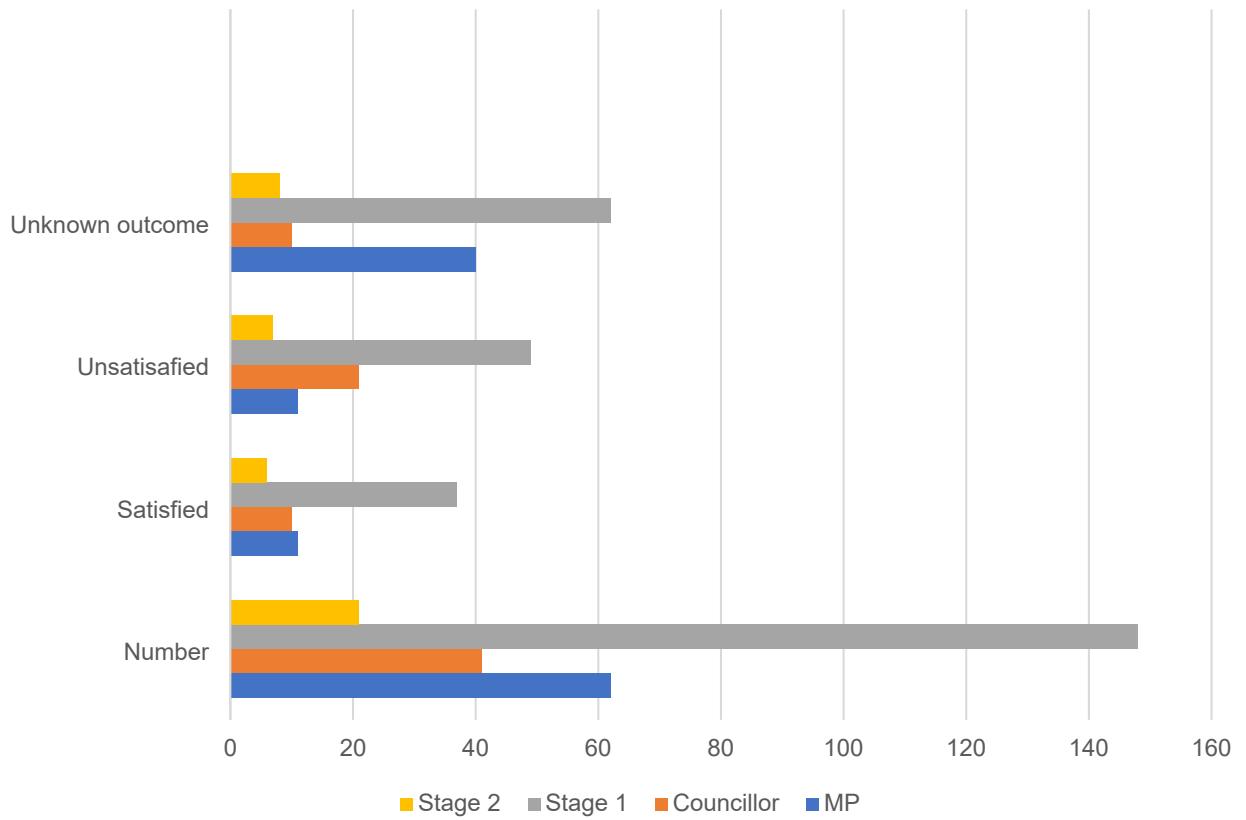


## 7. Quality Assurance and Satisfaction

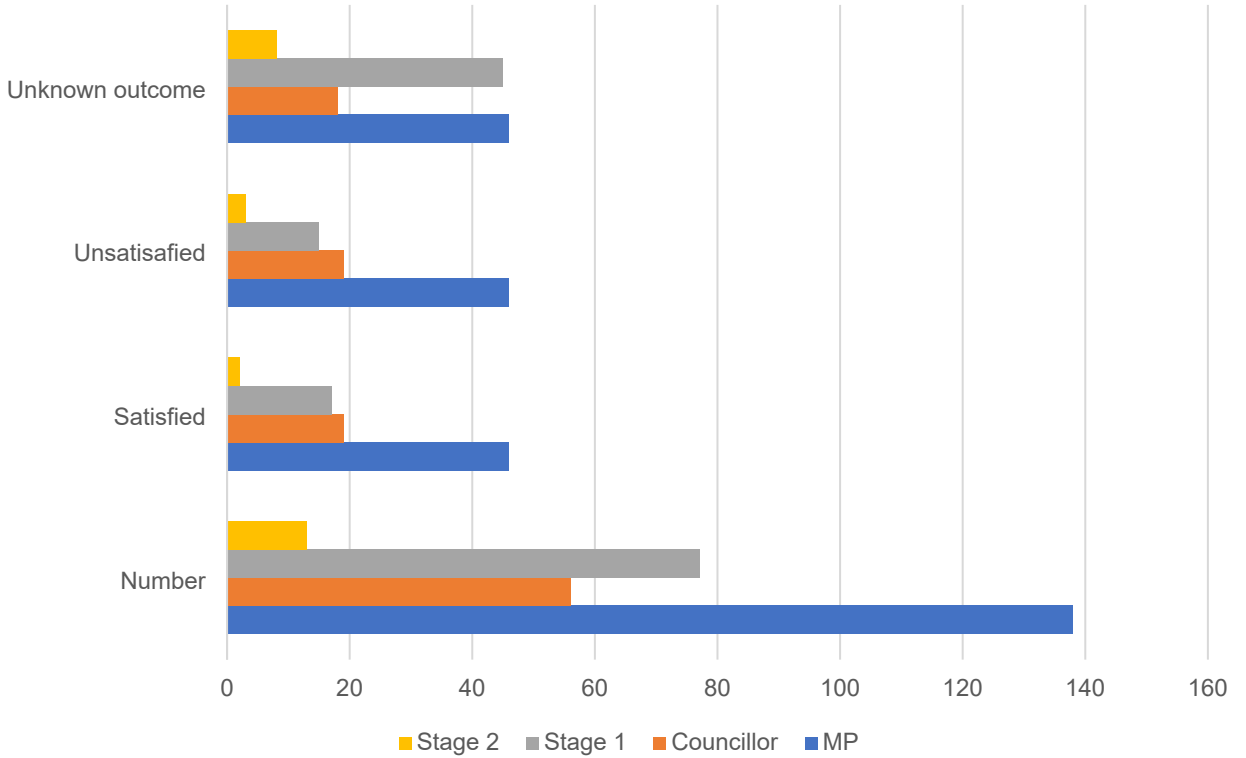
One of the most crucial aspects of handling complaints is gaining insight from the shortcomings identified during investigating and responding to a complaint. This learning helps prevent similar issues from recurring in the future. As part of our commitment to improve the complaints handling process, contact was made with every resident who made a complaint this year. In total, 715 quality checks were completed, accounting for 51% of complainants. Contact was made by phoning and emailing residents to find out if their complaint had been fully resolved to their satisfaction. There were several cases where the outcome was unknown. The 'unknown' outcome refers to instances where residents did not respond to the call or email.

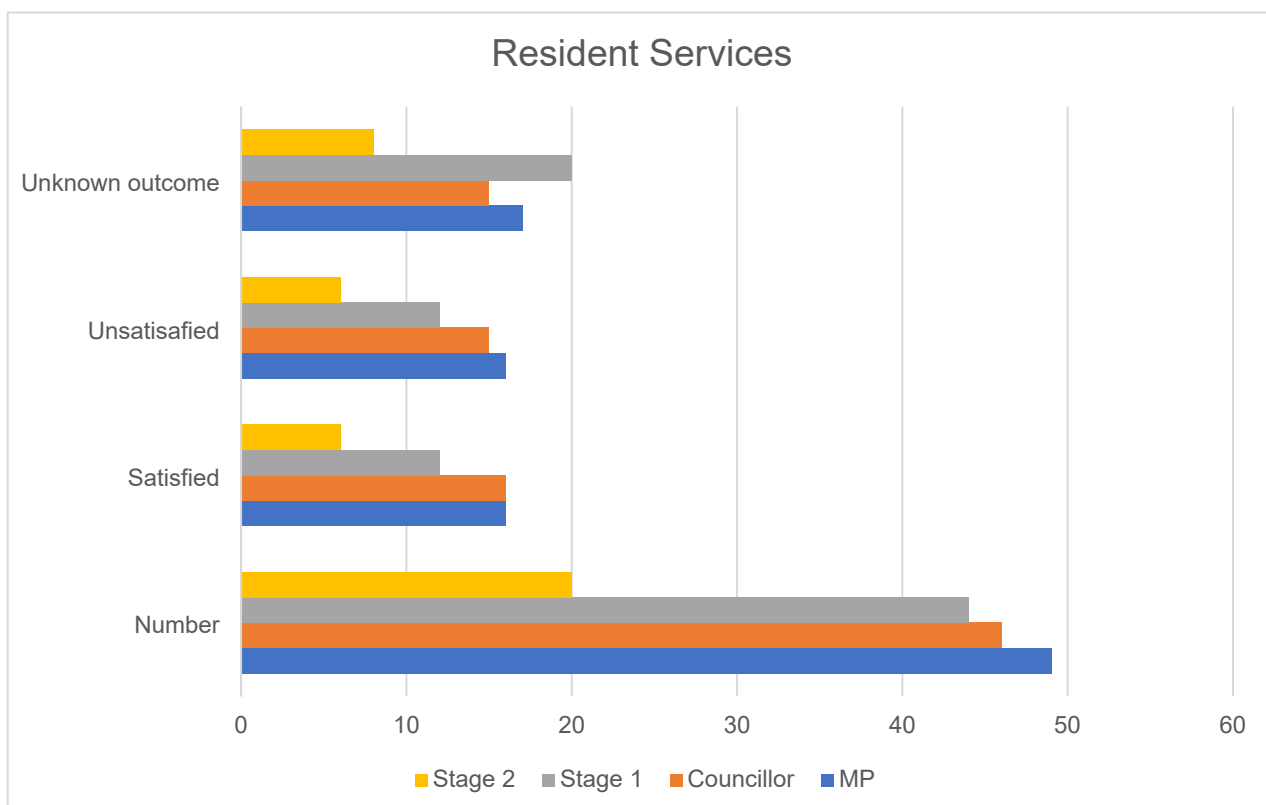
33% of residents who raised a stage 1 complaint against the Asset Management team were mostly dissatisfied with the outcome of their complaint. Much of the reason for this may be due to repairs that remain outstanding.

### Asset Management



### Housing Needs





As part of the quality assurance exercise, draft complaint responses are regularly reviewed for completeness, and to ensure the original complaint was dealt with. Advice and guidance are provided to colleagues to ensure the response aligns to the Housing Ombudsman Complaint Handling Code.

Managers are also required to review complaints recorded as upheld, and to provide recommendations from upheld complaints with a view to learn from the complaints. The new CX Housing Management System mentioned above enables this learning to be captured and reported on.

More is being planned to improve the quality of complaint responses, through workshops, training and e-learning.

## 8. Tenant Satisfaction Measures (TSMs)

The TSMs are performance measures designed to see how well landlords are doing, around five main themes. One of those themes concerns the effective handling of complaints, and we are required to report our performance to the Regulator of Social Housing.

Annual satisfaction surveys are carried out with council tenants to measure our performance on complaint handling.

The latest survey was carried out in January 2024. 173 tenants responded to the survey. The results showed that 32% of tenants sampled (172) stated they had made a complaint to housing services in the past 12 months. Less than a fifth of these tenants stated that

they were satisfied (19%) with how complaints are handled, with nearly four times as many dissatisfied (73%). Satisfaction has decreased by 10% since the previous survey (January 2023). It is worth noting that it is likely few are genuine complaints with the majority referring to service requests, such as ASB reports.



## 9. Ombudsman cases

### 9.1 Housing Ombudsman (HO)

We received 22 HO cases this year. 13 were for Asset Management, and 7 were for Resident Services. 2 were for both teams.

Ombudsman case reason	Number
ASB	4
Repairs	11
Major works	2
Staff conduct	2
Complaint handling	2
Service charges	1
Communal area	2

We received 6 determinations, 19 orders and 8 recommendations.

The compensation that we paid out following the HO's orders totaled £3,125 across 5 cases.

Maladministration refers to situations where a landlord is found to have failed in meeting its legal obligations, or adhering to its policies and procedures, or unreasonably delaying the resolution of a matter. Depending on the severity of the failure and its impact on the tenant, this could lead to findings of service failure, maladministration, or severe maladministration, based on the impact it had on the tenant.

We had maladministration on 3 of our cases this year, for the way we handled reports of repairs, reports of ASB, and for complaint handling.

We had 1 determination of service failure, for the way we handled the complaint.

We received 2 complaint handling failure orders (CHFOs), which are issued by the HO when there is an unreasonable delay or failure in complying with the HO's requirements for complaint handling. In this instance, the 2 we received were due to a delay in responding to the HO's request for evidence, and for not complying within their request

for action within the timescales given.

### HO outcomes

Closed after landlord remedy	Service failure	Maladministration	Referred back for local resolution	Incomplete or open	Outside HO jurisdiction	Total
4	1	3	8	5	1	22

The table above shows that most of the cases (36%) were referred back to complete the council’s complaints process, 4 cases (18%) were closed following reasonable redress or remedy from Housing Services.

### 9.2 Local Government and Social Care Ombudsman (LGSCO)

#### LGSCO outcomes

Closed with determination / orders issued	Incomplete / open	Closed after initial enquiry	Total
1	1	3	5

3 of the LGSCO cases that we received were closed prior to investigation, because there was either insufficient information to warrant an investigation, or the cases is outside of its jurisdiction.

One closed case found that there were 2 faults that the service made, causing injustice to a housing applicant. However, due to a fair and reasonable remedy offered to the applicant, the case was closed as satisfied. The remedy included:

- An apology
- Compensation of £500
- Procedure review of managing complex cases involving vulnerable people
- Staff training

### 10. Lessons learnt from complaints and service improvements made

Housing Services have an ongoing commitment to learning and improvement. Complaints and other formal enquiries are important feedback, providing an opportunity to understand where and why things sometimes go wrong and provide a basis for us to make improvements to the services we provide.

We have set up a Housing Improvement Programme, with a Housing Improvement Board, Action Plan, and 6 working groups (including one on the Transparency, Influence and Accountability Standard) to implement the regulatory changes from the Social Housing (Regulation) Act 2023 and drive service improvement.

We are aware of the low figure of complaints that were recorded as upheld or partially

upheld. However, we know that this figure is not accurate because of inaccuracies in reporting the complaint outcome. This has been addressed with the implementation of the new CX system. The new system will be used by all housing staff, to record the complaint outcome, and to add detail on lessons learned.

Whilst all services strive to address all the concerns of a complaint and to provide a response that resolves all the issues raised in a timely manner, we acknowledge that additional efforts are necessary to ensure complainants feel informed and receive timely updates on the progress of their complaint.

Communication continues to be a primary concern for residents who complained to us this year. There have been more changes in staff and as a result, some colleagues are unsure of who to liaise with on various issues. This has an impact on the more complex complaints that cut across housing teams. However, case conferences are arranged and held for complex or cross-team complaints, involving relevant officers from teams within Housing Services and beyond, to plan and agree a resolution to the complaint. These case conferences often involve the resident and have proven successful in de-escalating complaints.

Some of our residents have voiced their frustration with attempting to reach us by phone through Access Harrow, citing excessive wait times in telephone queues. To address this, we recently relaunched the online council housing account. This allows residents with smart devices to conduct various transactions online such as pay rent, contact their housing officer, and report a repair. This alleviates pressure on the phone lines for those who do not have access to an online account.

This year, we introduced regular drop-in events where residents can meet and discuss matters with their housing officer, leasehold officer, rent officer, and repair surveyor in person. Colleagues from housing needs are also available during these events. The drop-in sessions have been well-received, with an average of 30 residents attending each event.

Our anti-social behaviour policy (ASB) and procedure have undergone review to better address the needs of residents affected by the unsavory actions of others. Additionally, workshops are being conducted, to ensure all staff who handle ASB are aware of the updated policy and procedure.

We have also procured new contracts for the management of pest control and tree management, to improve the quality of our estates.

This year, all staff have been offered customer excellence training that aligns with the council's vision to put residents first. This training consisted of an introduction to ethos, and 5 other modules which aimed to embed excellent customer service throughout the council.

For the coming year we will continue our improvement journey, by:

- Introducing monthly meetings to review learning from complaints, and ensure an evaluation is carried out, and recommendations are implemented.
- Reviewing record keeping practices to ensure essential information is stored correctly and is accessible when needed to be submitted to the Ombudsman.

- Embedding the principles of the latest Housing Ombudsman Complaint Handling Code throughout the service, through workshops training and regular refresher newsletters, and adopt the dispute resolution principles with the aim to avoid complaint escalations.
- Creating learning action plans for upheld complaints, for managers to review and implement the learning outcomes.
- Developing a housing complaints policy and procedure, and a compensation policy, for the first time.
- We will continue to undertake quality assurance audit.
- In liaison with Housing Management IT provider, we will construct a tracker to monitor complaints and solutions.
- In light of the recent survey, we have commissioned a task and finish group to undertake deep dive and provide a report.
- Complex Housing complaints/ombudsman complaints to be tracked and monitored by a dedicated officer.

## 11. Compliments

This year, we received 25 compliments across all teams. Below is a sample of some of the content in the compliments received.

Quotes of compliments received in 2023/2024		
Asset Management	Housing Needs	Resident Services
<p>“His jolly and respectful attitude and humour clearly helps him get through his work”</p> <p>“...exhibited care, duty and compassion, well outside the remit of their individual roles”</p> <p>“Just want to say the surveyor who I had this morning was so kind, thorough and patient with me”</p>	<p>“We really appreciate you and thank you for the great job you are doing”</p> <p>“Thank you for all you have done for me during my move, much appreciated”</p> <p>“...professional during our visit to the property”</p>	<p>“Your guys have done an amazing job yet again”</p> <p>“extremely helpful and supportive and went the extra mile”</p> <p>“Thank you for taking the time to update me ... and for taking my security concerns into consideration”</p>

## 12. Overview

This report has provided an overview of complaints based on the Complaints Key Performance Indicators required by the Council. In comparison to 2022/2023,

2023/2024 saw a significant increase in our complaint numbers and member enquiries.

We continue to report to the Corporate Performance Board and to the Resident Board quarterly on the key performance indicators, and the report will soon be uploaded onto our website for our customers to see.

We strive to provide an excellent quality of service to all our customers but understand our service will sometimes fall short of residents' expectations. We will continue to use our complaints to identify areas for improvement in our processes and procedures.

Author:  
Charlene Samms  
Customer Service & Engagement Manager  
Housing



Appendix A: Breakdown of complaints data by tenure type 2023-2024

Stage 1 Complaints – Landlord services	
Received	249
Completed on time	198
Completed Late	49
Overdue	2
% Completed on time	79.5%
Upheld	4
Partially upheld	14
Not upheld	17
No outcome	214

Stage 1 Complaints - Landlord services and leaseholders	
Received	275
Completed on time	220
Completed Late	52
Overdue	3
% Completed on time	80.0%
Upheld	6
Partially upheld	16
Not upheld	19
No outcome	234

Stage 1 Complaints – All LB Harrow Housing Services	
Received	456
Completed on time	370
Completed Late	79
Overdue	7
% Completed on time	81.1%
Upheld	13
Partially upheld	23
Not upheld	47
No outcome	373

Stage 2 Complaints - Landlord services	
Received	42
Completed on time	37
Completed Late	4
Overdue	1
% Completed on time	88.1%
Upheld	3
Partially upheld	3
Not upheld	2
No outcome	34

Stage 2 Complaints - Landlord services and leaseholders	
Received	47
Completed on time	42
Completed Late	4
Overdue	1
% Completed on time	89.4%
Upheld	3
Partially upheld	3
Not upheld	3
No outcome	38

Stage 2 Complaints - All LB Harrow Housing Services	
Received	82
Completed on time	62
Completed Late	15
Overdue	5
% Completed on time	75.6%
Upheld	7
Partially upheld	5
Not upheld	9
No outcome	61

MPs - Landlord services	
Received	150
Completed on time	109
Completed Late	38
Overdue	3
% Completed on time	72.7%
Upheld	1
Partially upheld	7
Not upheld	9
No outcome	133

MPs - Landlord services and leaseholders	
Received	154
Completed on time	111
Completed Late	40
Overdue	3
% Completed on time	72.1%
Upheld	1
Partially upheld	7
Not upheld	9
No outcome	137

MPs - All LB Harrow Housing Services	
Received	539
Completed on time	439
Completed Late	92
Overdue	8
% Completed on time	81.4%
Upheld	1
Partially upheld	7
Not upheld	12
No outcome	519

<b>Cllrs - Landlord services</b>	
Received	132
Completed on time	93
Completed Late	37
Overdue	2
% Completed on time	70.5%
Upheld	2
Partially upheld	2
Not upheld	8
No outcome	120

<b>Cllrs - Landlord services and leaseholders</b>	
Received	145
Completed on time	101
Completed Late	42
Overdue	2
% Completed on time	69.7%
Upheld	2
Partially upheld	2
Not upheld	9
No outcome	132

<b>Cllrs - All LB Harrow Housing Services</b>	
Received	284
Completed on time	228
Completed Late	54
Overdue	2
% Completed on time	80.3%
Upheld	2
Partially upheld	2
Not upheld	9
No outcome	271

<b>Other - Landlord services</b>	
Received	2
Completed on time	2
Completed Late	0
Overdue	0
% Completed on time	100%
Upheld	0
Partially upheld	0
Not upheld	0
No outcome	2

<b>Other - Landlord services and leaseholders</b>	
Received	2
Completed on time	2
Completed Late	0
Overdue	0
% Completed on time	100%
Upheld	0
Partially upheld	0
Not upheld	0
No outcome	2

<b>Other - All LB Harrow Housing Services</b>	
Received	3
Completed on time	3
Completed Late	0
Overdue	0
% Completed on time	100%
Upheld	0
Partially upheld	0
Not upheld	0
No outcome	3

Appendix B: London Borough of Harrow Housing - Self-Assessment Form against the Housing Ombudsman Complaint Handling Code

**Section 1: Definition of a complaint**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i></p>	Yes	<p>Housing Services - Complaints &amp; Compliments Policy and Procedure April 2024</p> <p>Section 4.11</p>	<p>Regular reminders will continue to be shared with residents (e.g. on the website, through Homing In magazine and at Housing Matters meetings) and staff (e.g. through team meetings and Housing Feedback meetings)</p>
1.3	<p>A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.</p>	Yes	<p>Housing Services - Complaints &amp; Compliments Policy and Procedure April 2024</p> <p>Section 4.13</p>	<p>Ongoing staff training planned.</p> <p>Complaints via a third party are accepted (but consent is needed to share personal information).</p>

1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024  Section 4.2	Ongoing staff training planned.  Regular reminders will continue to be shared with residents (e.g. on the website, through Homing In magazine and at Housing Matters meetings) and staff (e.g. through team meetings and Housing Feedback meetings)
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024  Section 4.2	Ongoing staff training planned.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024  Section 4.15	While the definition of a complaint cannot be included in the Tenant Satisfaction Survey, respondents will be contacted after the survey.

## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024  Section 6	Ongoing staff training planned.
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024  Section 6	Ongoing staff training planned.
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024	

	other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.		Section 6 & 7.60	
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024  Section 6	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024- Section 6	Ongoing staff training planned.

### Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024  Section 7 & 24	Ongoing staff training planned.  Regular reminders will continue to be shared with residents (e.g. on the website, through Homing In magazine

	residents who may need to access the complaints process.			and at Housing Matters meetings).
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024 Section 22	Ongoing staff training planned.  This requirement is more challenging for local authority landlords, but all council staff should be familiar with the council's complaints policy.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	Complaints performance is monitored by the Portfolio holder and Performance board.	Complaints are monitored and benchmarked with peers to identify trends.  Steady increase in complaints year-on-year as reported across the sector. No unusual trends in volume or subject
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024  Section 7:14	Policies published on website.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024  Section 7:14	Regular reminders will continue to be shared with residents (e.g. on the website, through Homing In magazine and at Housing Matters

				meetings).  Information published on the website and in Homing In magazine.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024  Section 7:11  Complaints via a third party are accepted (but consent is needed to share personal information).	
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024  Section 7:2  Information published on the website and in Homing In magazine.	Regular reminders will continue to be shared with residents (e.g. on the website, through Homing In magazine and at Housing Matters meetings).



### Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024  Section 3:2	
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024  Section 7.	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024  Section 22  Training offer and training records- Induction training, mandatory training, ongoing training, refresher training- including CX complaints, Equality, Diversity and Inclusion	Ongoing staff training planned.

(EDI) and Customer Excellence.

### Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024	Housing Services - Complaints & Compliments Policy and Procedure April 2024 sits alongside council's Complaints Policy
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024 Policy- 2 stages	We have a two-stage complaint process
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024 Policy- 2 stages	We have a two-stage complaint process
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024 Sections 4.13 & 7.11	

	complaints processes.			
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024  Sections 4.13	
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	Housing Services - Complaints & Compliments Policy and Procedure April 2024  Acknowledgment letter sets out understanding of the complaint.	
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Section 7.14  Acknowledgment letter sets out understanding of the complaint and clarifies which aspects we are responsible for.	
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position;	Yes	Housing Services - Complaints & Compliments Policy and Procedure  Section 2	Ongoing staff training planned.

	<p>c. take measures to address any actual or perceived conflict of interest; and</p> <p>d. consider all relevant information and evidence carefully.</p>			
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Housing Services - Complaints & Compliments Policy and Procedure  Section 7.1	Ongoing staff training planned.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Section 24  Customer Access Strategy, Reasonable Adjustments Policy	Ongoing staff training planned.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	Housing Services - Complaints & Compliments Policy and Procedure  Section 7.5	Ongoing staff training planned.
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date	Yes	Housing Services - Complaints & Compliments Policy and Procedure  Section 7.2	Ongoing staff training planned.

	received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.			
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Housing Services - Complaints & Compliments Policy and Procedure , Compensation Policy  Section 9	Ongoing staff training planned.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Section 13  LBH Complaints procedure <a href="#">Section 5.3</a>	Ongoing staff training planned.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Section 14	Ongoing staff training planned.

## Section 6: Complaints Stages

### Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	No first half yes second half	Housing Services - Complaints & Compliments Policy and Procedure  This is included in our process map	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	Housing Services - Complaints & Compliments Policy and Procedure Section 7.2	
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Section 7.2	
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10	Yes	Housing Services - Complaints & Compliments Policy and Procedure Section 7.2	

	working days without good reason, and the reason(s) must be clearly explained to the resident.			
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes going forward	Housing Services - Complaints & Compliments Policy and Procedure Section 7.2	
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Section 7.2	
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Section 7.2	
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must	Yes	Housing Services - Complaints & Compliments Policy and Procedure Section 7.2	We must contact the complainant at the start to acknowledge and add on anything they want in their complaint.

	be logged as a new complaint.			
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	Housing Services - Complaints & Compliments Policy and Procedure  Section 7.21	

**Stage 2**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Housing Services - Complaints & Compliments Policy and Procedure  Please refer to flow chart & Section 7.22	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Section 7.3	



6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Section 7.2	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Section 7.2	
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Section 7.2	
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Section 7.4	
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	No	Housing Services - Complaints & Compliments Policy and Procedure Section 7.4	
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the	No	Housing Services - Complaints & Compliments Policy and Procedure Section 7. 3	

	issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.			
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Section 7.3	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Section 7.3	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	No	Housing Services - Complaints & Compliments Policy and Procedure Section 7.3	Create list of suitable staff and put in Complaints policy which roles are likely to investigate stage 2 responses

### Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>	Yes	<p>Housing Services - Complaints &amp; Compliments Policy and Procedure</p> <p>Section 9</p>	
7.2	<p>Any remedy offered must reflect the impact on the resident as a result of any fault identified.</p>	Yes	<p>Housing Services - Complaints &amp; Compliments Policy and Procedure</p> <p>Section 9 &amp; Compensation Policy</p>	<p>Policy: In future attach compensation policy at any stage of complaint</p>
7.3	<p>The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.</p>	Yes	<p>Housing Services - Complaints &amp; Compliments Policy and Procedure</p> <p>Section 9</p>	

7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Section 6.1	
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**Section 8: Putting things right**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>	Yes going forward	Housing Services - Complaints & Compliments Policy and Procedure Section 20.2	<p>We have issued qualitative and quantitative complaints analysis for 21/22 and 22/23</p> <p>Complaints Annual report to Cabinet (published on website and goes to Performance Board)</p>

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes		Cabinet is our governing body
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes going forward	Housing Services - Complaints & Compliments Policy and Procedure Please refer to section 20.1	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Please refer to section 19.11	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Please refer to section 22	LBH flag corporate links such as IT

### Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Housing Services - Complaints & Compliments Policy and Procedure  Please refer to section 22	We will consider bite-size learning sessions to highlight the changes required based on learning from complaints
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Please refer to section 20.1	Staff are encouraged to attend Customer Excellence workshop
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Please refer to section 21 & 22	Residents Board minutes Homing In Housing Matters Complaints Panel Housing staff newsletter Housing Feedback sessions Housing Improvement Board
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Please refer to section 20	New structure: Head of Insight and Strategy

9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	Portfolio Holder of Housing	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Please refer to section 20.13	As above
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes	Housing Services - Complaints & Compliments Policy and Procedure Please refer to section 20.13	Quarterly Report to Portfolio Holder for Housing – Performance Board  Annual Report (complaints)



9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul>	Yes	<p>Housing Services - Complaints &amp; Compliments Policy and Procedure Please refer to section 24</p>	
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