

Annual Landlord Service Complaints submission to the Housing Ombudsman Service

Committee name	Residents' Services Select Committee
Officer reporting	Rod Smith – Housing Landlord Programme Manager
Papers with report	Appendix A – Template Housing Complaints Performance & Service Improvement Report Appendix B - 'Effective involvement of governing bodies' – Housing Ombudsman Service Appendix C - Annual self-assessment against the Housing Ombudsman Complaint Handling Code Appendix D – Updated Complaints Action Plan 2024/25
Ward	All

HEADLINES

This report presents to Residents' Services Select Committee the outcomes from the management of formal complaints by the Landlord Service during 2024/25. The Service is required to manage formal complaints in line with the Housing Ombudsman 'Complaint Handling Code'. This annual process culminates in the production of an annual 'Complaints Performance and Service Improvement Report' which is submitted to the Housing Ombudsman by June each year. This submission must include comments from the governance structure in place for the Landlord Service. This report therefore provides the opportunity to include comments from the Select Committee within the final report prior to its publication. Complaints handling within the Landlord Service will continue to form part of the wider annual corporate complaints report which is submitted each autumn to Corporate Resources & Infrastructure Select Committee. Compliant complaint management is an integral part of the Social Housing Regulatory framework.

RECOMMENDATIONS

That the Committee:

- 1. Comments on the data, learning and feedback captured by the Landlord Service during 2024/25 as set out in Appendix A – Template Housing Complaints Performance & Service Improvement Report**
- 2. Notes the Housing Ombudsman Service Guidance set out in Appendix B on 'Effective involvement of governing bodies'**
- 3. Endorses the annual self-assessment against the Housing Ombudsman Complaint Handling Code set out in Appendix C**
- 4. Notes the updated Complaints Action Plan – Appendix D which was produced following the 2023/24 self-assessment against the Complaints Handling Code and published in June 2024**

SUPPORTING INFORMATION

Background

The new proactive regulatory regime for social housing providers came into force from April 2024. Following the tragic fire at Grenfell Tower in 2017 and the death of Awaab Ishak in 2020, the government has been working with the social housing sector and tenants to strengthen the voice of residents and introduce new legislation to ensure the quality of homes. The Social Housing (Regulation) Act 2023 forms a new era of regulation for the social housing sector, aiming to give tenants greater powers and improve access to quick and fair solutions to problems. Further information on the full regulatory framework can be found at <https://www.gov.uk/government/organisations/regulator-of-social-housing>

Key to the objective of driving up standards has been the development of a set of four new consumer standards. These outcome based standards apply to all social landlords, including the Council. Under the new standards landlords will need to:

- ensure tenants are safe in their homes
- listen to tenants' complaints and respond promptly to put things right
- be accountable to tenants and treat them with fairness and respect
- know more about the condition of every home and the needs of the people who live in them
- collect and use data effectively across a range of areas, including repairs

The four consumer standards are:

- The **Safety and Quality Standard** which requires landlords to provide safe and good-quality homes for their tenants, along with good-quality landlord services.
- The **Transparency, Influence and Accountability Standard** which requires landlords to be open with tenants and treat them with fairness and respect so they can access services, raise concerns when necessary, influence decision making and hold their landlord to account.
- The **Neighbourhood and Community Standard** which requires landlords to engage with other relevant parties so that tenants can live in safe and well-maintained neighbourhoods and feel safe in their homes.
- The **Tenancy Standard** which sets requirements for the fair allocation and letting of homes, as well as requirements for how tenancies are managed by landlords.

The Transparency, Influence and Accountability Standard makes specific reference to complaints including the following expectations:

'Registered providers must ensure their approach to handling complaints is simple, accessible and publicised.'

Registered providers must provide accessible information to tenants about:

- *how tenants can make a complaint about their registered provider*

- *the registered provider's complaints policy and complaints handling process*
- *what tenants can do if they are dissatisfied with the outcome of a complaint or how a complaint was handled, and*
- *the type of complaints received and how they have learnt from complaints to continuously improve services'.*

The Code of Practice, which seeks to amplify aspects of the Consumer Standards and how they should be interpreted, goes on to say in relation to complaints that:

Addressing complaints fairly, effectively and promptly is essential for registered providers to build trust with tenants. Registered providers should make every effort to ensure that tenants are aware of their complaints process. Tenants should be able to raise a complaint easily and should be listened to by their landlord when they do so.

In addressing complaints, registered providers should ensure that they provide regular updates to affected tenants about the progress they have made to resolve the complaint fairly and the next steps they plan to take, with clear timescales.

In meeting this outcome, registered providers are expected to consider relevant requirements of other bodies, including those of the Housing Ombudsman and specifically their Complaint Handling Code.

Complaints present registered providers with valuable insight into tenants' experiences of interacting with their landlord. Registered providers should make good use of this learning in order to improve services for tenants, bringing about change at a service or organisational level where appropriate. As part of this learning, registered providers should analyse trends and themes from complaints data.

Working alongside the Regulator of Social Housing is the Housing Ombudsman Service. Further information on the Housing Ombudsman Scheme can be found at <https://www.housing-ombudsman.org.uk> The Social Housing (Regulation) Act 2023 empowered the Ombudsman to issue a code of practice about the procedures members of the Scheme should have in place for considering complaints. This is mandatory for social housing landlords. This statutory code came into effect from 1st April 2024 alongside the Ombudsman's duty to monitor compliance. The Code Compliance Framework sets out the requirements placed upon social landlords as part of making its statutory annual submission by 30th June each year. The Code Compliance Framework can be found at <https://www.housing-ombudsman.org.uk/landlords-info/complaint-handling-code/>

The Landlord Service is now actively progressing completion of its second annual submission. The Council's 2023/24 [first] annual submission was uploaded to the Housing Ombudsman in June 2024 and, in line with requirements placed upon social landlords, the following documents were published on the Council's website:

- Housing Complaints Performance and Service Improvement Report
- Self-assessment against the Housing Ombudsman Complaint Handling Code
- Governing body's response to the 2023/24 Housing Complaints Performance & Service Improvement Report

In relation to the 2024/25 submission and to better align the Council's approach to governance in this area of compliance, the Landlord Service will report into the Residents' Service Select Committee each year ahead of the annual submission date of 30th June. This provides the opportunity to include comments from the Select Committee within the final report, prior to publication. Complaints handling within the Landlord Service will continue to form part of the wider annual corporate complaints report which is submitted each autumn to Corporate Resources & Infrastructure Select Committee.

Effective involvement of governing bodies

Housing complaints should perform a strategic role providing an essential source of intelligence on evolving risks and performance. They have the potential to identify issues which are not being identified elsewhere and provide insight and learning to help improve resident services.

A landlord's governance structure has a critical role to play in making this happen and ensuring a positive complaints culture within their organisation. The Compliant Handling Code sets the standards for compliant handling. It is a condition of membership that landlords comply with the Code and landlords are required to self-assess against it, reporting the outcome to their governing body. In summary terms complaints can help governing bodies effect change. They can help manage risks, enrich resident insight and engagement, reduce the cost of failure and evidence compliance. In organisations delivering high quality services complaints are valued as an opportunity to learn, an early warning of flawed processes, policies or behaviours, and to identify areas for improvement. Further information from the Housing Ombudsman Service on the effective involvement of governing bodies is included as **Appendix B**.

As part of its approach to scrutiny the Landlord Service has adopted a standard template for reporting purposes in order to 'build-up' the annual report via a series of rolling quarterly updates. These updates include documented feedback on the preceding quarters complaints from the tenant 'special interest group' on complaints and are reviewed by Corporate Management Team and Cabinet Member leads for the Landlord Service. This report and associated feedback cover the period April 2024 to March 2025. The template report is attached as **Appendix A**.

National Context

In January 2025, the number of complaints recorded across the UK topped 30,000 for the first time. By the end of March, Housemark [the leading data and insight company for the UK housing sector] estimate that the sector will have recorded 345,000 formal complaints in 2024/25. This increase of 20% from 2023/24 comes amid signs that previously 'masked' informal complaints are now being formally recorded.

These figures are still low compared to the number of Tenant Satisfaction Measure (TSM) survey respondents who felt they had made a complaint to their landlord. [TSMs are a statutory data set including management data and tenant perception data which social landlords have been required to capture and submit to the Regulator annually since April 2023]. With Regulator of Social Housing data suggesting that almost 3 in 10 English social housing tenants believe they made a complaint in 2023/24, the annual volume of complaints could be over one million in England alone.

Housemark qualitative and cost data is uncovering examples of landlords making significant investment in complaint handling – with an increase in specialist complaints staff accompanied by a higher profile within the organisation structure. For example, elevating complaints coordination from an administrative role to a dedicated managerial role. The approved restructure of the Housing Management Service includes such a new dedicated role which has been evaluated at ‘Principal Officer A’ grade. This role will work across the Landlord Service with a particular focus on ‘learning’ as a direct result of complaint handling from 2025/26.

Raising the profile of complaints handling is not only related to ‘learning’ and increasing the volume of recorded complaints but is also linked to satisfaction. Latest Housemark analysis has found that landlords with higher complaints volumes also tend to have better than average complainant satisfaction rates. Where satisfaction rates are below average, the number of recorded complaints is also much lower. The message is that better complaints recording feeds through to higher satisfaction as landlords learn from complaints and address root cause issues.

Figure 1- National Compliant Trends

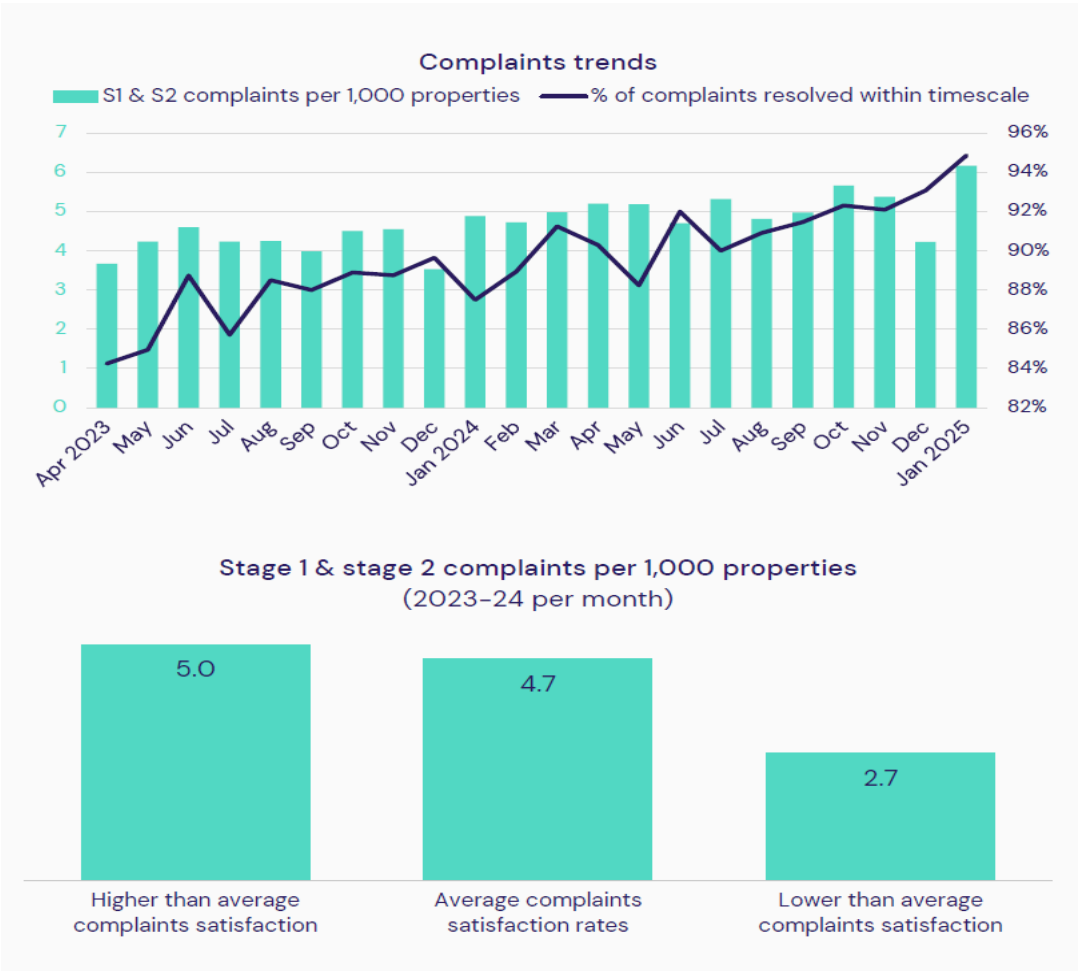


Figure 1 above shows the national trend for all English social housing providers to January 2025. For the ‘base year’ [2023/24], higher than average complaints satisfaction was associated with landlords recording 5 or more complaints per 1,000 properties in management and lower than

average compliant satisfaction was associated with landlords recording 2.7 or less complaints per 1,000 properties in management.

Figure 2 below shows the Council's position relative to peers within its London and ALMO benchmarking group. This data shows that levels of formal complaints recorded by the Council has increased over the rolling 12 month period and peaked in October 24. Complaints received per 1,000 properties in management was 5.7 in March 25 which was still well below the median position of 9.94 and the lower quartile position of 7.72 in February 2025.

In relation to the Council's TSM perception feedback from tenants on complaints; 'Satisfaction with approach to complaints handling', 23.50% of tenants were satisfied in 2023/24 compared to 25.44% in 2024/25. Based upon the Housemark analysis, the clear message for the Landlord Service is to improve tenant access to the complaints process, boost the total number of complaints captured and maximise the potential for learning from outcomes generated.

Figure 2 – Formal Complaints – London & Arm's Length Management Organisation Benchmarking Group

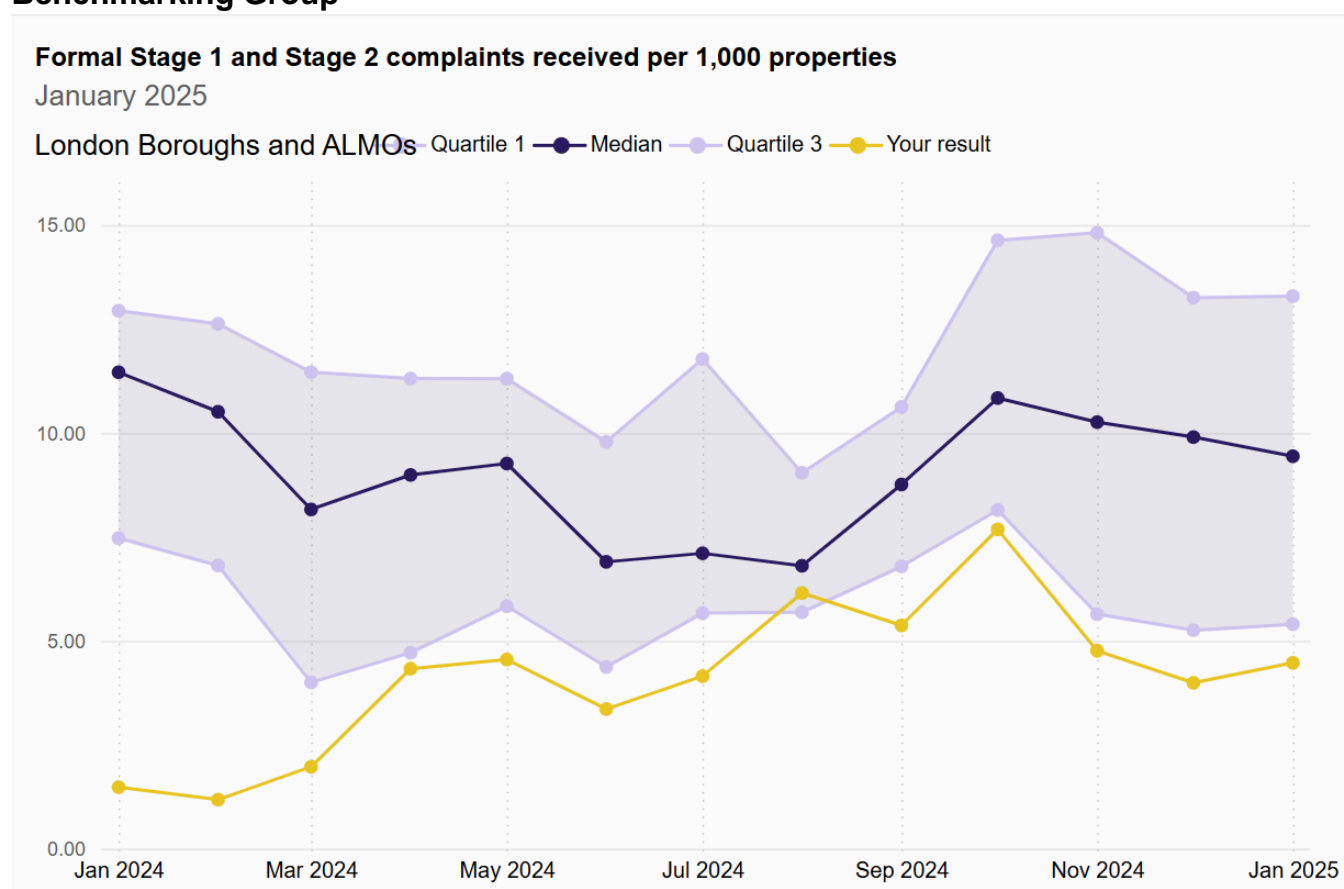


Figure 2 above demonstrates that the number of formal complaints received by the Landlord Service has been low compared with its London benchmarking group. In April 2024 the definition of complaints was aligned with the Complaint Handling Code and further promotional work with tenants undertaken in relation to accessing the complaints process. This has had a positive impact on overall complaint numbers but in relative terms they still remain low on a comparative basis. The Housing Ombudsman has clearly articulated that, as a single measure, an increase in

overall complaint numbers should not be viewed negatively by landlords but can demonstrate a more 'open' and positive complaints culture. The value of complaints can also be seen in terms of:

- An unfiltered source of insight
- An insight in terms of what is important to residents and
- A way of identifying if policies and practices are generating unfair outcomes for residents.

Moving forward the Services must, in conjunction with residents, continue to explore alternative approaches to promote access to the Council's complaints handling process.

PERFORMANCE DATA

Headline outcomes - Housing Complaints – April 2024 to March 2025

As set out in **Table 1** below, the number of stage 1 complaints received each quarter has remained fairly consistent with an average of just under 104 per quarter. The number of corresponding stage 2 complaints gradually increased during the course of the year with a notable slow down during the final quarter after a 'high' during the third quarter. The proportion of stage 1 complaints progressing to a stage 2 complaint was approximately 1 in 5 during the first half of the year, increasing to 1 in 2 during the third quarter and falling back to 1 in 4 in the final quarter. Overall, with a 1 in 3 conversion rate from a stage 1 to a stage 2 complaint, this would indicate that tenants remain dissatisfied with outcomes communicated to them and or the resolutions proposed or delivered. Moving forward, underlying reasons for the conversion rate from stage 1 to Stage 2 requires further investigation by Services with outcomes being reported to tenants.

The Repairs Service is already addressing this 'conversion rate' challenge by having a clear focus on providing stage 1 responses which are both comprehensive and readily understood by the complainant. This necessitates providing responses in 'plain English' and moving away from technical jargon and related text which may not be readily understood by the tenant and detracts from the core message of complaint resolution being shared. The Housing Management Service is ensuring that every complainant is personally contacted to ensure that the underlying reason for the complaint is fully understood and so that a tailored resolution can be proposed. During the final quarter of the year there were 111 stage 1 complaints and only 29 progressed to stage 2. This conversion rate of 26% reversed the trend for the preceding two quarters. The number of complaints escalated to / considered by the Housing Ombudsman remain relatively low and fell during the second half of the year. Of the 11 complaints a total of 8 were upheld. Details of cases upheld are set out in the template report attached as **Appendix A**.

Table 1 – Complaint summary by quarter

Quarter 24/25	Stage 1	Stage 2	% movement stage 1 to 2	Considered by Ombudsman	Upheld by Ombudsman
1	99	23	23	4	2
2	106	29	27	3	3
3	99	49	49	1	0
4	111	29	26	3	3
Total	415	130	31%	11	8

Table 2 – Complaints response times

Quarter 24/25	Stage 1 % within 10 working days	Stage 2 % within 20 working days	No of Extensions granted Stage 1 - 2	
1	52	70	N/A	N/A
2	20	90	N/A	N/A
3	72	80	N/A	N/A
4	83	69	19	4
Overall compliance	*57%	*78%	19	4

*Based upon 415 stage 1 and 130 stage 2 complaints.

The Housing Ombudsman Complaint Handling Code sets stage 1 complaint response times at 10 working days and stage 2 response times at 20 working days. **Table 2** above shows that, for stage 1 complaint response times, there has been a notable improvement in the second half of the year but overall compliance remained at 57% by the end of March 2025. The overall number of stage 2 complaints was lower and compliance with the 20 working day target was much higher with an overall compliance rate of 78% by the end of March 2025. This is an area of complaints handling where performance needs to improve. This will necessitate a better understanding of any particular areas of the Service which are under-performing, the setting of improvement targets, and to share this information with tenants.

Under the Complaints Handling Code it is legitimate to agree an extension to the 10 / 20 day target response time with the complainant. This would be the case where the complaint is particularly complex, involving a number of service areas and collation of information. From the last quarter of the year it has been possible for data on extensions to be captured and recorded. With 19 stage 1 extensions granted in the last quarter, this represents 17% of total stage 1 complaints. With 4 stage 2 extensions granted in the last quarter, this represents 14% of total stage 2 complaints. Moving forward there is a clear need to better understand the reasons for these extensions and to report the outcomes to tenants. Of the 23 extensions granted in the final quarter of the year, 12 related to the need for additional evidence and 11 were associated with the complexity of the case. The distribution of extensions granted by function are set out in **Table 3** below:

Table 3 – Extensions by service function in quarter 4

Service area	No of Extensions
Heating	4
Tenancy Management	8
Repairs & Maintenance	7
Planned works	2
Property & Estates	2
Total	23

During 2024/25 the Complaints Team have also been maintaining a central log of all 'reasonable adjustments' made to facilitate complaints by tenants. A total of 15 reasonable adjustments have been recorded this year. All make reference to members of the team taking the complaint by telephone and on one occasion it was agreed to read the final complaint response back to the tenant.

RESIDENT BENEFIT

The template report for 2024/2025 contains feedback from tenants who participated in the 'Special Interest Group - Compliments, Complaints and Learning'. This section of the report contains valuable insight and feedback from residents. Where appropriate, management responses have been inserted alongside issues raised by tenants. The group has met on three occasions during October 2024, January 2025 and March 2025.

The **Appendix A** Template Report, which has been updated by Service Teams throughout the year, contains documented references to key areas of learning and associated change which have been implemented following complaint analysis. All changes made seek to improve outcomes for tenants. A selection of learning and change is set out below:

Learning captured	Impact of change
Dissatisfaction with levels of communication associated with planned works	Residents more engaged and informed in relation to the delivery of planned works contracts
Concerns associated with 'drift' linked to the need for 'recall works'.	Target introduced to on recall works orders for contractor to attend within 10 days.
Challenge associated with the keeping of pets.	Review of Pets Policy to make outcomes clearer and fairer.
Dissatisfaction with complaints handling / responses.	<p>Template letter introduced requiring the understanding of the complaint to be clearly set out and the associated resolution to project consistent communication.</p> <p>Mandatory requirement for all complainants to be contacted as an integral part of complaint handling.</p> <p>All responses to include what action has been taken rather than what the Council will do, based upon feedback regarding failures to deliver agreed actions.</p>
Recurrent theme associated with 'delays' in progressing service requests leading to complaints.	<p>Q4 workshops arranged with tenant representatives and Services to document core service standards.</p> <p>Housing Management business case restructure approved to result in smaller</p>

	patch sizes and a more personal and responsive service to residents once implemented.
Dissatisfaction with ASB case handling.	Joint training undertaken with Tenancy Management and ASB Localities Team staff.
Concerns regarding 'drift' in completing repairs.	Monthly toolbox talks with Repairs Operatives include a clear focus on service improvement including reminders on arranging return visits to tenants whilst still on site.
Disconnection between learning from complaints and service delivery by contractors.	Learning outcomes and compliant issues incorporated into monthly contractor review meetings to ensure outcomes are embedded into their service provision.
Poor / delayed response to concerns raised by tenants occupying the two HRA temporary accommodation sites.	Service review resulting in ending our management out-sourcing arrangements / management brought in-house to improve responsiveness of service provision and response to concerns raised.
Concerns regarding the management of 'low level' ASB.	Production of a good neighbour guide and an associated toolkit to support staff and residents in better managing neighbour related issues.
Rent payments being assigned to the wrong rent account when paying 'over the phone'.	All payment references are now confirmed to the tenant before taking payment to avoid mis-posting of rent monies.
Tenants entering into rent arrears repayment arrangements which are not sustainable.	Income and expenditure forms are now completed as an integral part of entering into repayment arrangements.
Re-occurring issue within the responsive Repairs Service regarding 'house-keeping issues'	Issues associated with a lack of notes on job histories and outdated telephone numbers on job orders addressed with the team via toolbox talks and 'spot checks' introduced.
Resident concerns regarding ongoing ASB presenting in a number of tower blocks including rough-sleeping, drug taking and damage to property.	Initiative rolled out culminating in a number of Closure Orders secured which have secured a positive impact on presenting issues and positive feedback from residents.

The management team have also made increased use of the resources which are available to landlords from the Housing Ombudsman. This includes a range of courses / webinars and access to the following published reports:

- **Insight reports** – The Housing Ombudsman publishes insight reports every three months. These reports provide insight into complaints data, a selection of valuable case studies and key learning points and recommendations for the sector. The aim is to help landlords to make improvements and deliver better services for residents.

- **Spot-light reports** - These reports concentrate on an area of service provision where the Ombudsman sees a high amount of failure through their casework. They examine the issues within a theme and set out recommendations.
- **Special investigation reports** – these reports follow an investigation carried out under paragraph 49 of the Housing Ombudsman Scheme, which allows the Ombudsman to conduct further investigations beyond an individual complaint to establish whether any presenting evidence is indicative of a systemic failing.
- **Quarterly compliant handling reports** – Complaint Handling Failure Orders are issued in relation to failings in an individual case where the Ombudsman has taken reasonable steps to seek engagement from a landlord, but the resident remains unable to progress a complaint. Orders are used, along with other information from cases handled, to generate insight about individual landlords. This can be used as the basis of discussions if there are continued concerns over a sustained period.
- **Learning from severe maladministration** – this relatively new report looks at recent severe maladministration findings. The report groups together several cases, potentially involving different landlords, to examine related themes and lessons, including where vital opportunities were missed to improve outcomes for residents.

The management team have made particular use of 'insight reports'. In relation to issues of dampness, condensation and mould [DCM], this included a 'self-assessment' against the themes and recommendations brought forward by the Housing Ombudsman and the subsequent production of an action plan and a DCM Policy document. The influential spot-light report on 'attitudes, respect and rights – relationship of equals' was used in January 2025 to bring forward a draft Policy on 'Vulnerable Residents and Reasonable Adjustments' which will be discussed further with tenant groups. Moving forward officers will be evaluating more of their work and practices against the output provided by the Housing Ombudsman to support 'learning' and the delivery of better outcomes for tenants.

Next steps

The Service will complete the Housing Complaints Performance & Service Improvement Report, incorporating feedback from tenants, Landlord Board, CMT and Cabinet Member leads and Residents' Services Select Committee to enable the final report to the Housing Ombudsman to be uploaded and incorporating the necessary 'governing body response' along with the completed self-assessment – **Appendix C**.

As part of supporting and embedding a culture of change across the Landlord Service workforce in relation to managing and learning from complaints, a monthly 'complaints panel' has been established where Service leads can bring forward and discuss complaint related matters including:

- Complaint numbers and themes
- Understanding regarding 'avoidable escalation triggers' to stage 2 complaints
- Understanding regarding 'avoidable escalation triggers' to review and determination by the Housing Ombudsman
- Housing ombudsman judgements
- 'Learning', 'change' and 'improvement' captured as a result of complaint management

- Good practice which will positively influence tenant satisfaction associated with compliant handling
- Discuss any current or new 'spot-light reports' issued by the Housing Ombudsman and how this might impact service delivery following 'self-assessment' against any Ombudsman recommendations

The clear priority tasks for 2025/2026 are to improve the depth and breadth of complaints data which is brought forward and shared with tenants and the Landlord Service governance structure to better evidence the impact on tenants from our learning. We will work with tenants to understand what matters to them and what data will support them in reviewing and scrutinising the Council's approach to complaints handling. From a review of complaints undertaken in 2024/25, this data set could include, but not be limited to:

- Identifying and understanding where issues associated with 'fairness' and 'respect' are underlying within complaints raised
- Improved identification and analysis of trends and themes
- Complaint volumes by Service area
- Equalities data associated with complaints captured including; ethnicity, age group and gender.
- Complaint outcomes by Service area [Not upheld, partially upheld, upheld]
- Underlying reasons for complaints progressing from stage 1 to stage 2 complaints
- Compliance with the Complaints handling code target response times by Service area
- Reasons for the granting of extensions to complaint response times by Service area
- Resident satisfaction with complaint handling
- Housing Ombudsman Service casework including numbers against the full list of possible findings e.g. Maladministration, service failure, reasonable redress or whether the case is out of jurisdiction.
- The values of compensation paid
- An overview of training delivered to positively influence the culture of staff working on Complaints

Based upon its experience and performance during 2024/25, the Landlord Service has embraced the expectations set down by both the Housing Ombudsman Service and the Regulator of Social Housing. Embedding a more positive culture in relation to complaints handling across all staff groups is key in this context along with working jointly with tenants to identify and learn from this aspect of tenant feedback to improve services and outcomes for tenants. To support this continuing journey, the Landlord Service will work with tenants to develop a suite of measures which will be more widely reported and help to drive improvements in performance and changes in behaviours.

FINANCIAL IMPLICATIONS

N/A

LEGAL IMPLICATIONS

Social Housing (Regulation) Act 2023

BACKGROUND PAPERS

NIL

APPENDICES

Appendix A – Template Housing Complaints Performance & Service Improvement Report

Appendix B – Housing Ombudsman guidance on 'Effective involvement of governing bodies'

Appendix C - Annual self-assessment against the Housing Ombudsman Complaint Handling Code

Appendix D - updated Complaints Action Plan which was produced following the 2023/24 self-assessment against the Complaints Handling Code and published in June 2024

**Housing Complaints Performance
and Service Improvement Report for the period
1 April 2024 to 31 March 2025**

1. Introduction

Hillingdon Council is required by the Housing Ombudsman Service to demonstrate compliance with the Complaint Handling Code. This is the document that we will be using to provide information showing our performance against the Complaint Handling Code along with service changes, improvements and learning which has been made throughout the year. It will be used to provide quarterly performance, activity and outcome data to Landlord Board, the two Corporate Management Team Leads, Cabinet Member Leads with responsibility for Housing, our Complaints & Complements Special Interest Group and Residents' Services Select Committee.

2. Background information

a. Definition of a complaint

In general terms a complaint can be considered as: *"an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the council, its own staff, or those acting on its behalf, affecting an individual or group of individuals."*

b. Definition of a Service Request

A Service Request is defined as a request from a resident/people to the Council requiring us to take action to put something right. Whilst Service Requests are not complaints, they may contain expressions of dissatisfaction, and the Local Government and Social Care Ombudsman advise that we should have the opportunity to deal with a Service Request before a complaint is made.

c. Who can complain?

Anyone who uses our services, including services provided on our behalf by a third party such as a contractor, can complain to us.

d. Exclusions

- although a complaint can be submitted against Council **policy**, it should be noted that Council policy cannot be overturned through the complaint process as this can only be done through the statutory decision-making procedure;
- we will not deal with issues through the complaint procedure where a claim has been made in a court such as a disrepair claim; and
- issues relating to employment or application for employment with the Council cannot be addressed through the complaint procedure.

e. Accessibility and Awareness

Complaints can be made quickly and easily 24 hours a day, seven days a week via our website at www.hillingdon.gov.uk/complaints. If a reasonable adjustment is needed to facilitate access to our complaint process, complainants are asked to call the complaint team.

f. Complaint Handling Staff

All staff within the team are experienced and fully trained to deal with complaints, including any reasonable adjustments required by vulnerable residents. They have also been provided with additional training by a member of staff from the Local Government and Social Care Ombudsman on 16 May 2024.

g. The Complaint Handling Process

The complaint procedure that applies to the Housing Ombudsman Service is the corporate complaints procedure which was revised on 1 April 2024 to fully align with the Complaint Handling Code operated by the Housing Ombudsman Service and the Local Government and Social Care Ombudsman. Our procedure:

- allows managers to address issues of unsatisfactory service and seek improvements in service delivery;
- ensures that customers are treated fairly and consistently;
- ensures that a proper and adequate investigation takes place before any action is taken;
- requests for reasonable adjustments will be considered in line with the Equality Act 2010 and appropriate training is provided for staff; and
- safeguards the integrity and good reputation of the Council.

h. Complaint Stages

The Council has a two-stage complaint process which is in line with the Complaint Handling Code.

i. Putting things right

Where we have identified injustice or hardship suffered, we will always try to put the complainant back to the position they would have enjoyed before the situation went wrong. Types of redress include:

- an apology;
- providing the service that should have been received at first;
- taking action or making a decision that should have been done before;
- reconsidering an incorrect decision;
- improving procedures so that similar problems do not occur again; and
- if after an investigation by Council staff or the Ombudsman, it is concluded that because of maladministration there is no practical action that would provide a full and appropriate remedy or if the complainant has sustained loss or suffering, financial compensation may be the most appropriate approach.

j. Unreasonable or Unreasonably Persistent complaints

If we consider that a complainant is unreasonable or unreasonably persistent, we will refer the matter to a senior manager, who will consider whether restrictions should be placed on their contact with the Council.

k. Compliments, Complaints and Learning – Special Interest Group

Following on from the Tenant & Leaseholder Conference in June 2024 a commitment was made to develop 'Special Interest Groups' (SIG) for each service area. 'Compliments, Complaints and Learning' was one of these groups. A database of residents who expressed an interest in this subject area was collated. The first meeting was held on 22 October 2024 and 8 residents attended. The meeting was chaired by the Customer Engagement Team. Also in attendance was the manager and representatives from the Complaints Team. The purpose of the initial meeting was to review current policies and procedures. Attendees were shown how the compliments and complaints system operated, including how to register an issue, how these feed into the Council's back-office system and an overview of the complaints system dashboard was demonstrated.

The numbers of compliments and complaints received was outlined, as well as the different stages within the policy, expected timescales for responses and performance against the timescales. Residents were asked for feedback on how the current system works and what can be done to improve it. The next meeting was scheduled for mid to late January where an action plan will be drafted along with agreed terms of reference for the group. Minutes from the meeting will be posted on the Council website and can be requested in other formats. Please see **Appendix 2** for issues raised from the 22 October 2024 meeting and the associated management responses.

Update from Special Interest Group - Compliments, Complaints and Learning

Feedback and response from action points raised at the Developing Service Standards session on 17 January 2025

Feedback	Response
Have a call back telephone system so people are not on hold for a long period.	CET to refer to ICT/Resident Hub
Improve telephone response time, to reduce the time people are waiting for the calls to be answered.	As above – query over whether this relates to general calls or calls to the Complaints team number.
The website to be more user friendly and easier for residents to navigate, instead of having to search or scroll through multiple pages and get more frustrated and/or give up.	CET in process of setting up a working group to review website.
Website to have a complaints option on the landing page or the report it page, with clear instructions on what	CET to address with Complaints & Web team

constitutes a complaint.	
Residents would be interested to attend a Focus Group on the Hillingdon website and work with the Comms Team to make it easier to use, including videos to show to do things.	CET in process of setting up a working group to review website.
Consider whether AI could be used to develop a digital assistant to help residents with queries on the website	<p>Chat option now introduced on council website.</p> <p>Council has recently announced details of a new partnership with ICS.AI to deliver a £1 million initiative to deploy Artificial Intelligence technology to transform resident contact and service efficiency as part of our Digital Strategy.</p> <p>The two-year contract will see us deploy a new AI digital assistant across our website and call centre to help resolve resident enquiries quicker and provide self-service options to help free up staff to support residents with complex issues.</p> <p>Through our adoption of new technologies, we're making great strides in the digital space, which, at its heart, is about giving you the capacity to focus on high-value tasks and making it easier for local people to use our services.</p>
There should be a unified approach from the entire council, where automatic response is sent to resident and a response time scale explained along with a reference number to enable a tracking system.	CET to address with ICT
Currently residents often receive an email to say a case is closed but no reference number or description is given so residents don't know what case they are referring to.	CET to address with ICT
Not all residents can report issues online and there is a need for a face-to-face option or a place where residents can go to receive support to make a complaint, for example, libraries or in the Civic Centre, or from other Council staff who visit residents/estates etc. This is also	<p>CET to address with Complaints team/Resident hub/Senior Management</p> <p>Suggestion of upskilling resident volunteers to support others in making complaints.</p>

relevant to vulnerable residents, those with communication issues or language barriers.	
Clear process for residents to request a face to face or online appointment (Zoom/Teams) with a reference number and confirmation of the appointment	CET to address with Complaints team
Service standards and KPI's to be published clearly on the website or give details of how/where residents can obtain this information in writing or another preferred format.	TSM data published on website. CET to follow up with Complaints team & Management
Information on how to make a complaint or service standards should be routinely advertised to residents, for example on rent/service charge letters or Council Tax bills, in Hillingdon People Magazine, libraries, notice boards, pharmacies, GP's etc.	CET to note and take forward
Any changes in processes should also be communicated in a variety of ways to ensure all residents are aware.	CET to note and cascade to service areas to use web, social media, e-newsletters, other outlets suggested above to notify residents of any changes.
Council to ask and record how residents would prefer to be contacted, across the board and not just in one department and have an opt in/out option for receiving information or updating their preferences.	Wider council project needed. Across Housing services, project planned in Q1 to update resident data and store in systems for easy use in future.

Update following SIG meeting on 19 March 2024

Meeting was attended by 8 residents, 5 of which were tenants, 3 leaseholders.

Members reviewed the log of actions from the previous meetings and were grateful for and acknowledged the updates received. It was noted that positive changes had already been made, including updates to the council website and it was understood there is a solid plan in place for progress and appreciated that some changes take time to implement.

It was noted that feedback from the session will be passed to Senior Management/Landlord Board for review and the intention for this to be formalised into the council's standard way of working, to ensure the residents voice is captured and that the council, as the landlord, can be held accountable. Attendees welcomed this step and were keen to be a part of the process and the opportunity to review progress. It was noted that this would form part of the requirements of the Regulator and Ombudsman for landlords to engage with residents and involve them in all areas of service delivery, including complaints handling, as well as the Regulator's Transparency, Influence and Accountability Standards.

Q4 complaints data available was reviewed and the following points noted for clarification:

Number and % of Stage 1 complaints where extensions have been granted.	19
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Query raised if this is a total of 19 complaints and not 19% of Stage 1 complaints. Final report to clearly state the number and associated percentage.

Members would like to see a list of reasons as to why extensions had been granted and which service they relate to.

For all complaints related data, members would like to see which service the complaints relate to (i.e. not just repairs) and the breakdown between tenants and leaseholders, if possible.

Learning actions were noted and recent feedback from Repairs team was shared that repairs staff are being encouraged to report any issues of concern, repairs related or not, when they are in a resident's home. Members felt a holistic approach was positive, as well as contact details being updated and follow up appointments being booked directly, addressing the issue of any potential un-booked follow-on works.

SIG members were advised that the Engagement strategy was currently being reviewed and a new strategy was due to be drafted, in co-production with residents. Extracts from the HQN report on 'Resident involvement in complaints' were shared with the group and the following opportunities for resident involvement were welcomed. All members felt this was a step in the right direction and were willing to be involved.

Resident involvement opportunities

How and when landlords involve their residents in complaints is not prescribed by the Ombudsman or the Regulator and so is left up to each landlord and varies significantly. The most common forms of involvement are:

- **Scrutiny:** resident or customer panels reviewing and commenting on draft complaint procedures, formal complaint responses, complaint handling data etc. They may also listen to the experiences of other residents and look at the landlord's learning from complaints. Some panels sit under and report to the board/committee, giving them more influence over service improvements
- **Stage two complaint panels:** residents taking part in the final, stage two, decision panel following a complaint investigation. Historically, these panels were often convened at stage three, but are now far less common as complaint procedures are limited to two stages (since April 2024)
- **Satisfaction surveys:** eg, residents telephoning recent complainants to ask survey questions and explore the reasons for their answers
- **Mystery shopping:** eg, residents making 'test' complaints through different channels (telephone, email, online etc) to assess the speed and quality of responses. Mystery shoppers often work closely with scrutiny panels to provide more comprehensive feedback
- **Peer-to-peer support:** landlords sometimes train residents to act as peer advocates or 'complaint champions' who support or assist other residents with making a complaint, understanding their rights and communicating with the landlord. This creates a more approachable and supportive environment for residents who may be less able or confident when raising complaints. It can also reduce any intimidation or fear associated with the formal complaint process.

Training and upskilling of residents to empower them to be involved in these types of opportunities were discussed and suggestions made including how to navigate the council website, how to find out information about council services and how to analyse data etc. Resources were discussed including support from council staff, training provided by the council and other organisations such as TPAS and 'Four Million Homes'.

A discussion on incentives for residents to be involved took place and this idea was welcomed, however, members felt that other incentives, such as having access to training which would not only help them to be involved in these types of groups, but which would support or empower them in other areas of their lives was preferred.

Members agreed that most of the discussions that took place aligned with the points set out in the forward planning for the council's approach to complaints handling for 2025/26. This included improvements in the extent of data shared.

Several members volunteered to co-chair future meetings and be involved in producing and shaping the presentation slides.

Next meeting is scheduled for 21 May where the action plan will be reviewed and co-produced with residents and the Terms of Reference signed off.

Quarter 1 – 1 April to 30 June

Number of Service Requests received.	101
Number and % of Service Requests responded to within 10 working days.	101
Number of Stage 1 complaints registered.	99 (86 for repairs)
Number of Stage 1 complaints acknowledged within 5 working days.	99
Number of Stage 1 complaints where extensions have been granted.	Data not currently available
Number of Stage 1 complaints responded to within 10 working days?	51
Number of Stage 2 complaints registered.	23
Number of Stage 2 complaints acknowledged within 5 working days.	23
Number of Stage 2 complaints where extensions have been granted.	Data not currently available
Number of Stage 2 complaints responded to within 20 working days?	16
Number of Housing Ombudsman complaints concluded within this quarter.	4
Number of Ombudsman complaints upheld and not upheld – see annex 1 with information of the complaint and outcome.	2 Upheld 1 Outside of jurisdiction 1 Not Upheld
Number of tenancies and leases managed (housing stock)	10,333 tenancies 3,000 leases
Lessons Learnt / themes	Improve communications with residents in relation to Planned Works.
Service Improvement(s) made	Regular updates with contractors and resident liaison. (Planned Works)

Quarter 2 – 1 July to 30 September

Number of Service Requests received.	87
Number and % of Service Requests responded to within 10 working days.	87
Number of Stage 1 complaints registered.	106 (For repairs 73)
Number of Stage 1 complaints acknowledged within 5 working days.	106
Number of Stage 1 complaints where extensions have been granted.	Data not currently available
Number of Stage 1 complaints responded to within 10 working days?	21
Number of Stage 2 complaints registered.	29
Number of Stage 2 complaints acknowledged within 5 working days.	29
Number of Stage 2 complaints where extensions have been granted.	Data not currently available
Number of Stage 2 complaints responded to within 20 working days?	26
Number of Housing Ombudsman complaints concluded within this quarter.	3
Number of Ombudsman complaints upheld and not upheld – see annex 1 with information of the complaint and outcome.	3 Upheld
Number of tenancies and leases managed (housing stock)	10,333 tenancies 3,000 leases
Lessons Learnt / themes	Top 3 <ul style="list-style-type: none"> • Additional staff training needed in 95 complaints • Delays complained of in 39 complaints • Poor communications in 10 complaints
Service improvement(s) made	<ul style="list-style-type: none"> • Regular updates with contractors and resident liaison. (Planned Works)

	<ul style="list-style-type: none"> • Special Interest Group for Compliments, Complaints and Learning established, and first meeting held on 22 October 2024. • Operatives are being given additional information through the monthly toolbox talks to help improve the service to customers • The recall system - If a works order is raised the contractor needs to attend within 10 days • Complaints Board set up within Housing Management service 09/09/2024 - Ensuring allocation and response to complaint are on time. • Operatives are being given additional information through the monthly toolbox talks to help improve the service to customers • Review of Pets policy based on complaint made with regards to keeping Pets – this will be completed with residents and to Cllr once completed. • The recall system - If a works order is raised the contractor needs to attend within 10 days • Amendments made to the template for complaints clearly setting out understanding of the complaint is and our resolution to it, improving clear and consistent communication. • Proposing restructure to address numbers of frontline officers and reduce patch sizes – residents' complaints about delays in response linked to staffing numbers. • All complainants are called to discuss their complaint before a response is made to ensure we have the full understanding. • Complaints are written stating what action has been taken rather than actions we will take, this is based on feedback of failing to complete actions agreed to complete in complaints • Training completed <u>ombudsman findings August 2024 - Values - 22-23.pptx</u> • Localities and Housing have undertaken case management training provided by Janine Greene associates
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	<ul style="list-style-type: none"> Localities <u>report weekly</u> on caseloads, new cases, and performance standards regarding timeliness of customer contact and risk assessment
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Quarter 3 – 1 October to 31 December

Number of Service Requests received.	131 (86 for repairs)
Number of Service Requests acknowledged within 5 working days.	131 (86 for repairs)
Number of Stage 1 complaints registered.	99 (75 for repairs)
Number of Stage 1 complaints acknowledged within 5 working days.	99 (75 for repairs)
Number of Stage 1 complaints where extensions have been granted.	Data not currently available
Number of Stage 1 complaints responded to within 10 working days?	71
Number of Stage 2 complaints registered.	49 (33 for repairs)
Number of Stage 2 complaints acknowledged within 5 working days.	49 (33 for repairs)
Number of Stage 2 complaints where extensions have been granted.	Data not currently available (Repairs 4)
Number of Stage 2 complaints responded to within 20 working days?	39 (29 for repairs)
Number of Housing Ombudsman complaints concluded within this quarter.	1
Number of Ombudsman complaints upheld and not upheld – see annex 1 with information of the complaint and outcome.	1 – Did not investigate
Number of tenancies and leases managed (Housing stock)	10,333 tenancies 3,000 leases
Lessons Learnt / themes	Top Learning Themes:

	<ul style="list-style-type: none"> • Improved communications providing regular updates to residents • Regular feedback to operatives to ensure service provision remains consistent. • Proactive ASB Prevention and Resolution
Service improvement(s) made	<ul style="list-style-type: none"> • <u>Repairs</u> - Operatives are provided with monthly information at toolbox talks providing additional information to aid in continuous improvement to the service we provide to residents. This includes process reminders for arranging return visits with residents while on site. • <u>Repairs</u> – Incorporated learning outcomes and complaint issues into monthly contractor review meetings to ensure learning outcomes are incorporated into their service provision. • <u>Localities Team</u> Weekly reports (noted at Q2) augmented with whole team case management meetings where national developments (E.g. Ombudsman reports) are shared to provide greater context • <u>Localities Team</u> building on national best practice engaged with Leeds Community Safety Partnership (West Yorkshire Police, Leeds City Legal) and as a result were successful in securing partial closure notices for persistent ASB at two Tower Blocks. Impact to be assessed but was a result of persistent complaints and disquiet to local response. • <u>Street scene Enforcement Team</u> - Review of current Public Spaces Protection Order (PSPO) 2023 – public consultation January/February 2025 • <u>Street scene Enforcement Team</u> - Introduction of a new PSPO 2025 specifically for private hire vehicles. In response to residents' complaints/service requests related to anti-social behaviour and impact on local environment. • <u>Street scene Enforcement Team</u> - Targeted approach to areas identified as 'hot spots' for rubbish accumulation/fly tipping. Engagement with residents/businesses, joint working with waste services, CCTV and community payback scheme (probation service).

	<p>Enforcement actions and processes reviewed.</p> <ul style="list-style-type: none"> • <u>Council owned hostels</u> used for temporary accommodation for homeless households bought back in house, dedicated Housing Management Officer managing both blocks providing direct personal contact daily with residents resulting in reduction of complaints and delays in information being received by housing management to action. • <u>Tenancy Management</u> – review of training to all Tenancy Management officers on the back of a complaint regarding tenancy changes • Good Neighbour Policy/PN and Toolkit implemented to reduce complaints and improve performance in relation to non ASB nuisance issues. • <u>Tenancy Management</u> – Conversations regarding succession where there is a long standing and emotional connection to the property, with the possibility of a hardship panel that will review the case to submit for senior management new tenancy approval. • <u>Rent Collection & Arrears Recovery</u> – ensuring accuracy of taking payments & payment references are confirmed with the customer before taking payment. • <u>Rent Collection & Arrears Recovery</u> – completion of income & expenditure form on cases where payment arrangements are being entered into or being set up.
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Q3: Repairs demand: 10,567 repairs reported

This means that we undertook 1.02 jobs per property (10,333 total stock) within three months of which 1.02% were complaints (108).

Of the 108 complaints 20.37% (22) were fully upheld, 37.96% (41) were partially upheld and 41.67% (45 the largest proportion) were not upheld.

Of those complaints upheld or partially upheld (63), 50.79% (32) resulted in learning outcomes to improve the service potentially preventing these issues becoming complaints in the future.

As part of the Council's commitment to continued engagement with tenants and leaseholders to seek feedback on our performance and work with residents to improve services, a series of

Developing Service Standards Sessions were organised for January and February 2025. These followed on from the Tenant & Leaseholder Conference in held in June 2024, along with the Special Interest Group meetings that were held from August to October 2024.

Residents who had previously registered an interest in working with the Council to improve services were invited to these sessions and a Complaints focused group met on 17 January 2025. 8 residents attended consisting of 5 tenants and 3 leaseholders. The Customer Engagement team organised, facilitated and chaired the meeting along with the manager and monitoring officer from the Complaints Team. The session aimed to go through the current service standards, identify which elements were set in stone by the Regulator and Ombudsman and encourage residents to comment on and suggest improvement for parts they could influence.

Most attendees had already attended the Special Interest Group meeting for Complaints, so the session was aimed at building on what had already been covered and identifying some key deliverable and achievable action points.

These are summarised as follows:

- Have a call back telephone system so people are not on hold for a long period.
- Improve telephone response time, to reduce the time people are waiting for the calls to be answered.
- The website to be more user friendly and easier for residents to navigate, instead of having to search or scroll through multiple pages and get more frustrated and/or give up.
- Website to have a complaints option on the landing page or the report it page, with clear instructions on what constitutes a complaint.
- Residents would be interested to attend a Focus Group on the Hillingdon website and work with the Comms Team to make it easier to use, including videos to show to do things.
- Consider whether AI could be used to develop a digital assistant to help residents with queries on the website.
- There should be a unified approach from the entire council, where automatic response is sent to resident and a response time scale explained along with a reference number to enable a tracking system,
- Currently residents often receive an email to say a case is closed but no reference number or description is given so residents don't know what case they are referring to.
- Not all residents can report issues online and there is a need for a face-to-face option or a place where residents can go to receive support to make a complaint, for example, libraries or in the Civic Centre, or from other Council staff who visit residents/estates etc. This is also relevant to vulnerable residents, those with communication issues or language barriers.
- Clear process for residents to request a face to face or online appointment (Zoom/Teams) with a reference number and confirmation of the appointment.
- Service standards and KPI's to be published clearly on the website or give details of how/where residents can obtain this information in writing or another preferred format.

- Information on how to make a complaint or service standards should be routinely advertised to residents, for example on rent/service charge letters or Council Tax bills, in Hillingdon People Magazine, libraries, notice boards, pharmacies, GP's etc.
- Any changes in processes should also be communicated in a variety of ways to ensure all residents are aware.
- Council to ask and record how residents would prefer to be contacted, across the board and not just in one department and have an opt in/out option for receiving information or updating their preferences.

The Customer Engagement team will pick up these key points and arrange to meet with internal staff including the Complaints team, Corporate Comms/Web team, ICT and Contact Centre/Resident Hub to take forward and report back to residents at the next Special Interest Group meeting, as well as include progress in Q4 of this report.

Quarter 4 – 1 January to 31 March

Number of Service Requests received.	195 (30 with Repairs)
Number of Service Requests acknowledged within 5 working days	100%
Number of Stage 1 complaints registered.	111 (85 with Repairs)
Number of Stage 1 complaints acknowledged within 5 working days.	100%
Number and % of Stage 1 complaints where extensions have been granted.	19 (17%)
Number of Stage 1 complaints responded to within 10 working days?	92
Number of Stage 2 complaints registered.	29 (23 With Repairs)
Number of Stage 2 complaints acknowledged within 5 working days.	100%
Number and % of Stage 2 complaints where extensions have been granted.	4
Number of Stage 2 complaints responded to within 20 working days?	20

Number of Housing Ombudsman complaints concluded within this quarter.	3
Number of Ombudsman complaints upheld and not upheld – see annex 1 with information of the complaint and outcome.	3 Upheld
Number of tenancies and leases managed (housing stock)	10,333 tenancies 3,000 leases
Lessons Learnt / themes	Lessons Learned: <ol style="list-style-type: none"> 1. Commitment to Continuous Improvement: Staff will recognise the value of continuous improvement through regular toolbox talks and direct resident appointments. 2. Effective Response to Community Concerns: Staff will learn to effectively address community concerns through transformation efforts, enforcement measures, and annual surveys.
Service improvement(s) made	<ul style="list-style-type: none"> <u>Localities Team:</u> The team continues its transformation, securing three further partial closure notices (Tower Blocks) and two full closure notices in response to persistent complaints and disquiet to local response. The efficacy of these measures has been subject to positive feedback and will require full evaluation. <u>Community Safety:</u> The borough wide Crime and Disorder Survey is due to go live that includes an opportunity to comment on ASB. This will be repeated annually and will enable progress about concerns to be measured at a population level. <u>Repairs:</u> Team Leaders will conduct one-on-one meetings with staff members to provide additional support and training. They will continue to emphasize the importance of updating job notes and contact information to ensure better communication and efficiency in future repairs. This approach ensures that key expectations

	<p>are consistently embedded within the Service.</p> <ul style="list-style-type: none"> • <u>Repairs</u>: A reminder to all staff to make appointments with residents directly, addressing the issue of any potential un-booked follow-on works. Although occurrences of this nature have significantly reduced, general awareness needs to continue. Toolbox talks will continue to highlight our commitment to continuous improvement.
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Q4: Repairs demand: 10,520 repairs reported

This means that we undertook 1.02 jobs per property (10,333 total stock) within three months of which 1.03% were complaints (108).

Of the 108 complaints 24.07% (26) were fully upheld, 31.48% (34) were partially upheld and 44.44% (48 the largest proportion) were not upheld.

Of those complaints upheld or partially upheld (60), 55.56% (4) resulted in learning outcomes to improve the service potentially preventing these issues becoming complaints in the future.

Appendix 1 – Investigations undertaken by the Housing Ombudsman Service (HoS)

HoS ref and complaint details	Outcome of complaint
202324088 The complaint is about: <ul style="list-style-type: none"> a. The landlord's management of the kitchen works. b. The landlord's record keeping. c. The landlord's handling of the resident's complaint 	Upheld The Council is to apologise in writing for the delays in kitchen renewal and pay the resident a sum of money for the distress caused by the delays, plus an additional sum for mishandling her complaint
202307805 The complaint is about the resident's Right to Buy application, including the landlord refusing to communicate with the resident's representative. □ The representative's subject access request and request for a copy of the tenancy agreement.	Outside of Jurisdiction The Ombudsman advised the complainant that his complaint is outside the jurisdiction of the Housing Ombudsman and is not one they can investigate
202225990 The complaint is about the landlord's	Upheld The Ombudsman found that the

response to a request for assistance to repair the damage caused to the interior doors in her home	Council's approach in this case was insensitive and lacked empathy and failed to recognise that the resident and her young family were vulnerable and required some flexibility in the way the landlord applied its policies. There was maladministration in our response to the request for the doors to be repaired or replaced.
202209354 The landlord's handling of: a. The reports of anti-social behaviour (ASB). b. the request for permission to erect a fence. c. The subsequent complaint	Not Upheld There was no maladministration by the landlord in its handling of the resident's reports of antisocial behaviour and in its response to permission regarding a fence. There was a service failure by the landlord in relation to its complaint Handling (time taken to respond to complaint).
202334242 The complaint is about the way the landlord responded to the resident's reports that it had sold land belonging to her property.	Upheld The Ombudsman noted the Council's attempts to put things right by offering a sum in compensation, make a direct offer of like for like accommodation when a suitable property becomes available, pay for the resident's removal costs, pay the resident for the cost of the driveway she had installed and meeting the cost of installing a driveway if it could not find a suitable property with a parking space. There was a finding of maladministration as it did not go far enough to restore the position for the resident.
202310021 The complaint is about the landlord's handling of the resident's reported damp and mould in his flat.	Upheld The Ombudsman determined that the Council should apologise, offer a sum of money in compensation, ask the complainant whether they wish to make a public liability claim, contact the resident whether they wish us to record the health conditions on their records and compile an action plan to complete a self-assessment against the Ombudsman's Knowledge and Information Management report.
202310109 The complaint is about the landlord's handling of repairs to the heating system	Upheld The Ombudsman determined that the Council apologise, pay an amount in

	compensation and undertake a review of its record keeping system and takes steps to establish a system of record keeping that ensures all contact from a resident (including service requests and complaints) is recorded and retained so that it can be provided to this Service upon request, in response to a complaint.
24012834 The complaint is that the Council failure to take enforcement action against one of its tenants for erecting a building which is not in accordance with the associated planning permission.	Did not investigate The Ombudsman did not investigate this complaint as there was not enough evidence of fault by the planning enforcement team, and they have no power to look at the actions of the Council in its role as a social housing provider.
202346988 Ms R complained about the Council's handling of repairs required in her home.	Upheld The Ombudsman found failing in the Council's handling of repairs in relation to the window Sils and kitchen cupboards and that proper records were not kept when telephone contact was received. The Council agreed to apologise, update its procedure and pay a sum of money in compensation.
202402457 Ms B complained about the Council's handling of outstanding repairs and damp and mould in her property.	Upheld The Ombudsman found delays in completing outstanding repairs and in our handling of damp and mould. The Council agreed to apologise and make a payment in compensation.
202341070 Ms J complained about the Council's handling of repairs to her roof, the car driveway, damp and mould in her property and our handling of her complaint.	Upheld The Ombudsman found maladministration in our handling of the repairs to Ms J's property, not providing information on how to make an insurance claim and that we did not respond to all the issues in the complaint response. The Council agreed to complete all the work, apologise and make a payment in compensation.

Appendix 2 – Feedback from complaint Special Interest Group meeting 22 October 2024

Feedback	Response
Issues with the current online complaints system had been experienced including sessions timing out or there not being	It was established that this related to the old online complaint form that complainant used prior to 3 July 2023. The current

enough space available for lengthy submissions.	system allows for 4,000 characters of information to be included and attachments to be added.
Changes/improvements have been made to the online reporting system in the last year but not communicated to residents. The Council needs to be better at communicating changes and improvements to residents by using all channels available to them such as newsletters, publications and social media.	Feedback noted by Service Leads and the recently established Special Interest Groups will serve as a further opportunity to feedback on relevant changes and improvements.
Residents had experienced issues in making complaints via the telephone, including calls not being answered.	There is a direct line telephone number that residents can use to complain (01895 277800) – Monday to Friday from 9 am to 5 pm and this is advertised on our website.
Complaints are not centralised within the Council, there are complaints staff in different service areas and not all complaints are being logged via the central online reporting system.	There is a central complaint team that process complaints and manage complaints that are received. Calls taken by the Contact Centre staff follow a different path and these calls would not be logged as a complaint, although they will be logged as an enquiry.
The Complaints Manager does not have oversight of all complaints being logged due to the above point and there are inconsistencies with how complaints are dealt with.	The point being made here was that any staff dealing with complaints (investigating and responding) would fall under the management of the Complaint Manager. This is not practical, but the Complaint Manager would see all Stage 2 complaint responses before they are sent to ensure consistency of approach.
Gap in training for staff, especially for those not working in the main Complaints team.	As part of improving the timeliness and quality of responses, the Landlord Service will be developing and rolling out mandatory 'Complaint Management' training for staff groups across the Service in 2024/25. The training outline will be shared with the SIG before implementation.
Not all residents can report issues online and there is a need for a face-to-face option or a place where residents can go to receive support to make a complaint, for example, libraries or in the Civic Centre, or from other Council staff who visit residents/estates etc.	<p>The Council's website makes it clear that if you need advice or guidance on submitting a complaint, please call 01895 277800 (Monday to Friday, 9am to 5pm).</p> <p>As part of the mandatory training on complaints for all staff groups, it will be made</p>

	clear to staff how they can advise, guidance and support tenants in relation to making complaints.
Lack of joined up approach from different Council services/departments in addressing/dealing with complaints.	The Council's approach is to provide a single response to all enquiries raised in one complaint. Where there are several departments involved, the complaint team will often pull the draft response together for the relevant manager.
Assumption from residents that Council services/departments share information, however, data protection rules do not always allow this.	It was suggested that information provided by residents should as a matter of routine be shared with every service within the Council. It was explained that we need to be mindful of the General Data Protection Regulations and that is why information submitted to one department would not routinely be shared with all other departments.
Residents are not routinely given a reference number when logging complaints or provided with one when requested. Again, this links back to not all complaints being logged via the central system.	<p>There is a misunderstanding here – this relates to people calling staff in the Contact Centre who are not complaint handlers. Generally, if they say they want to complain they are put through to the complaint team.</p> <p>If someone calls the complaint team, it must be logged onto the system and if this is being done by an officer it can take 5/10 minutes to do, and we would not want to keep people on the phone. However, once logged, it will generate an email to the complainant informing them of the reference number and details of who is investigating it and when they can expect a response.</p>
Residents using old/defunct Council email addresses to make complaints and no bounce back messages being received so they are unaware their complaint has not been received.	<p>The Council stopped handling complaints via emails on 3 July 2023 and if an email is sent to this address, they will usually get an out of office message advising them to submit their complaint online via the Council's website</p> <p>https://www.hillingdon.gov.uk/complaints</p> <p>Further work is underway to promote to tenants the various ways they can make a Complaint in relation to a service provided by their landlord.</p>

Perception/experience of leaseholders is that they get less help/support than tenants.	Tenants and leaseholders share the same landlord and, in many areas, share the same services. In the context of promoting access to the formal complaints handling process and investigating and responding to complaints, leaseholders should not receive a different service. This extends to help and support. This feedback will be considered as part of the ongoing promotional work linked to accessing the complaints handling procedure and in relation to the mandatory staff training being developed.
Residents would like to see stats on the number of complaints that are satisfactorily resolved, however, this is not logged, only response times are logged.	The Council publishes its complaint performance on our complaint web page at www.hillingdon.gov.uk/complaints . What we cannot do is provide data showing whether a complaint has been resolved or not. All we can do is provide data to show how many complaints were responded to and within the timelines set. This is because without asking a complainant after each response whether they consider the complaint resolved or not, it is not possible to say. What we can say is that if 100 complaints are responded to and 20 escalate to Stage 2, that it is likely that 80 complainants are satisfied with the response they received and consider their complaint resolved.

Appendix B – Housing Ombudsman guidance on ‘Effective involvement of governing bodies’

Governing bodies can support learning from complaints by:

Compliance

- Ensuring their organisation is compliant with membership obligations under the Housing Ombudsman Scheme and meets the standards set out in the Complaint Handling Code through continuous self-assessment and implementation of adjustments. This self-assessment process can also be an opportunity for resident involvement and scrutiny, something we have seen many landlords successfully do.
- Ensuring their organisation complies with Complaint Handling Failure Orders and orders made where maladministration has been found.
- Cooperating with Ombudsman investigations when they are referred to the governing body.

Awareness

- Tasking the organisation to raise awareness of the complaint process, making sure it is accessible and effective to build confidence in complaint handling among residents as a core part of a positive resident and landlord relationship.
- Ensuring every employee supports effective complaint handling, ensuring complaint handlers have the authority within the organisation to help put things right when they go wrong.
- Ensuring openness and transparency with residents about complaints.

Learning

Encouraging cross-organisational learning and sourcing learning from other organisations.

Using intelligence provided by the Ombudsman to develop and improve services, ensuring recommendations are actioned and, where necessary, reviewing policies, procedures and approach following Ombudsman reports.

- Reviewing the Ombudsman's annual landlord complaint performance report and considering performance against peers.
- Demonstrating learning from complaints through the commentary in the annual Financial Statements.

Governance Reporting

- The Complaint Handling Code requires one member of the governing body to have lead responsibility for complaints. This role is responsible for ensuring the governing body receives regular information on complaints that provides insight and learning on the landlord's complaint handling performance. As a minimum, the governing body should receive:
- Regular updates on the volume, categories, and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders.
- Regular reviews of issues and trends arising from complaint handling.
- The annual performance report produced by the Ombudsman, where applicable.
- Individual complaint outcomes where necessary, including where the ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales.
- The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.

Other information that is helpful for governing bodies is:

- Resident feedback – to enable discussion of key themes or concerns for residents, recognise success and identify further actions that may be required.
- Horizon scanning – this should include key changes in the social housing sector that will impact on residents and the delivery of housing services. This will include legislation and regulation.

Member landlords will govern their services differently and the Housing Ombudsman has a diverse membership. Where information on complaints is reported will vary, whether to the main board or cabinet or delegated to a committee, and how the main governing body seeks assurance is a matter for individual landlords.

Good questions to ask

In supporting, challenging, and seeking assurance from executive teams, board members and councillors can enable high quality debate and reflection by asking critical questions such as:

- How are we raising awareness of our complaint procedure?
- How would we know if particular groups within our residents were finding it hard to complain, or to achieve a satisfactory resolution of their complaint?
- What assurance do we have that we comply with the Ombudsman's Complaint Handling Code?
- Why did we receive a Complaint Handling Failure Order and what have we done to avoid a recurrence?
- How does our complaint performance compare to other similar landlords?
- How do we use the Ombudsman's thematic reports and determinations to improve our own services?
- How do we triangulate our complaint information, other sources of customer feedback and service quality indicators by geography and other characteristics to inform our strategies?
- What does the annual self-assessment tell us? What actions need to be taken?
- What did we learn from complaints last year/quarter?
- How is this learning being disseminated to staff? And to residents?

Tools for governing bodies

The Ombudsman provides several tools to support board members and councillors.

- **Landlord performance reports** – these online reports provide data, information, and insight on complaint handling performance
- **Complaint Handling Failure Orders** – we publish the total number of failure orders issued, the names of the landlords and the reasons for the orders.
- **Spotlight reports** – thematic reports on issues identified through complaints the Ombudsman has investigated and resolved such as heating and hot water, leaseholders, and shared ownership.
- **Annual complaint performance report** – this will provide an overview of complaints handling performance in the sector, with analysis and insight. These reports are usually published in the autumn and cover the previous financial year.

- **Governing bodies webinars** – these webinars focus on the role of governing bodies in delivering effective complaint handling services.
- **Insight reports** – these provide insight into the Ombudsman's casebook and contain information on complaint handling data and trends.
- **Published decisions** – we publish our investigation decisions every two weeks.
- **E-newsletter** – the Housing Ombudsman Service have a regular e-newsletter that you can subscribe to.

Appendix C - Annual self-assessment against the Housing Ombudsman Complaint Handling Code

Hillingdon Council Self-Assessment Form: Housing Ombudsman Complaint Handling Code – Completed March 2025

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <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>	Yes	The Corporate Complaints Procedure can be downloaded from this page Complaints - Hillingdon Council This definition is included in Section 1.	This precise wording is used in Hillingdon Council's Corporate Complaints Policy and Procedure.
1.3	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.	Yes	Presentations were delivered virtually to all staff involved in the handling of complaints that the word "complaint" did not need to be used for us to progress by way of a complaint but where dissatisfaction is expressed it needs to be brought to the attention of the complaint team for advice. Complaint handling Masterclasses are delivered four times a year for all staff that handle complaints.	
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	The definition of a Service Request has been included in the Council's Corporate complaints procedure. They are logged, monitored and processed in the same way as complaints and Officers in the complaints team have oversight on whether a complaint has been responded to or not. We keep records of Service Requests submitted.	The Council makes a distinction between a service request and a complaint.
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	This is part of the Council's Corporate complaints procedure which can be accessed at www.hillingdon.gov.uk/complaints	
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	We will advise someone responding to a survey where and how they can submit a complaint.	The Council recognises that survey responses may contain a 'complaint'. We ensure that appropriate signposting to the complaints service takes place, and we raise awareness of how to complain while conducting surveys.

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	This is included in the Council's Corporate complaints procedure in which we set out what complaints we can and cannot progress and this is also set out on the complaint web page: www.hillingdon.gov.uk/complaints	The Policy and Procedure includes the following text: "If we consider that a complainant is unreasonable or unreasonably persistent, we will refer the matter to a senior manager, who will consider whether further investigation of the complaint will be carried out."
2.2	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: <ul style="list-style-type: none"> The issue giving rise to the complaint occurred over twelve months ago. 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. Matters that have previously been considered under the complaints policy. 	Yes	This is included in the Corporate complaints procedure and contained within the complaint page: www.hillingdon.gov.uk/complaints	The Complaints Policy includes the following text: "We will not deal with issues through the complaint procedure where a claim has been made in a court such as a disrepair claim"
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 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.	Yes	This is contained within the Corporate complaints procedure which can be found on the following web page: www.hillingdon.gov.uk/complaints	<i>It states within our policy that "Anyone who uses our services and is dissatisfied with the standard of service we have provided or our lack of action. The Council will also accept complaints by an advocate on behalf of a resident, with appropriate consent. However, any complaint should be made within 12 months of the issue/incident complained of."</i>
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	Yes	Included within the Corporate complaint's procedure which can be found on the following web page: www.hillingdon.gov.uk/complaints	In practice a letter is sent if a complaint is not accepted and the policy states "If we do not intend 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.			<i>progress your complaint, we will inform you of this in writing, tell you why we will do this and give you the contact details of the Ombudsman to whom you may escalate your complaint to for independent review."</i>
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Each complaint received is considered on its own merit	

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 residents who may need to access the complaints process.	Yes	This is set out within the Corporate complaints procedure which can be found on the following web page: www.hillingdon.gov.uk/complaints	Complaints can be made in person, by telephone, in writing, via our website or email. In addition, the policy document also states that "If you need an adjustment to be made, please call the complaint team." We keep a log of all reasonable adjustments requested and our response to each request.
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	Information is available on Complaints and our handling of it is available on the Staff portal, setting out what they need to do and who to contact	
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	Volumes of Service Requests and formal complaints has risen when comparing 2023/24 with 2024/25 figures.	For 2023/24 we recorded 4,240 Service Requests and Formal complaints and so far for 2024/25 we have recorded 5,197 Service Requests and formal complaints. Data is benchmarked and shared with the Tenant Special Interest Group. We recognise that high volumes of complaints is positive and used to improve the service we already provide.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two-stage	Yes	Published on our website and it sets out the 2 Stage Corporate complaints procedure –	We have also been meeting with residents to discuss how else to advertise and we are

	process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.		www.hillingdon.gov.uk/complaints	exploring other options such as including complaint details on Council Tax demands, rent statements and our e-newsletter.
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	The Corporate complaints policy is published on our website and advertised in our E-newsletter/. The policy contains information about how to submit a complaint, the contact details of the Ombudsmen and the Complaint Handling Codes are also published on our web page.	
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	The Corporate complaints procedure sets this out and it can be found at: www.hillingdon.gov.uk/complaints	The policy states that " <i>The Council will also accept complaints by an advocate on behalf of a resident, with appropriate consent.</i> "
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	Included within the Corporate complaint's procedure and it can be found at: www.hillingdon.gov.uk/complaints	

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	There is a dedicated Complaint and Members Enquiry Team that processes all complaints. The annual complaint report is put before the Finance and Corporate Services Select Committee for scrutiny and then published on the complaints page, which can be found at: www.hillingdon.gov.uk/complaints	We have a corporate complaint handling team and a complaint manager responsible for processing complaints and providing advice and guidance to staff. An annual complaint report is provided for the Finance and Corporate Services Select Committee. The report contains information about complaints, compliments and Members Enquiries submitted. From 2024/25 scrutiny will also be provided prior to the annual submission to the Housing Ombudsman Service by Residents Services Select Committee which has a clear focus on the Landlord Service.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt	Yes	A centralised complaint team is responsible for engaging with staff at	We have a Corporate complaint handling team that is

	resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.		all levels and where there are issues, they have access to senior managers for support and resolution.	responsible for processing complaints, providing advice and guidance, delivering training sessions for officers across the Council and in attending management meetings to provide information and advice on the handling of complaints.
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	A centralised complaint team is in place, where staff have been trained to process complaints, with most staff having worked in the team for over 8+ years. The complaint portal has categories to capture learning, and this is reported on in the annual complaint report, which can be accessed at www.hillingdon.gov.uk/complaints	

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	Corporate complaints procedure is the policy that we use, and it can be accessed at www.hillingdon.gov.uk/complaints	
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	The Council's Corporate complaint procedure complies with the requirements set out in the Complaint Handling Codes namely a 2 Stage complaint process. www.hillingdon.gov.uk/complaints	
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	The Council's Corporate complaint procedure sets out our 2 Stage complaint process. www.hillingdon.gov.uk/complaints	
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 complaints processes.	Yes	The Corporate complaint procedure states that we will progress by way of a complaint expressions of dissatisfaction in relation to " <i>or those acting on its behalf</i> " through our own procedure. The Corporate complaints procedure can be accessed via	

			our web page at: www.hillingdon.gov.uk/complaints	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	We will process complaints in accordance with the Corporate Complaints procedure. www.hillingdon.gov.uk/complaints	Where appropriate we will ask our contactor to respond to a complaint using their own complaint procedure but where a complainant is dissatisfied with the response they receive, we will log it as a formal complaint, investigate and respond to the complainant.
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	Within the acknowledgment we send to a complainant it will contain a summary of our understanding of the complaint and what they want by way of a resolution.	We will acknowledge receipt within 5 working days and inform the complainant of the reference number, who will be investigating, when they can expect a response to be sent to them, set out details of the complaint, etc. If anything is unclear, we will always ask for clarification before beginning the investigation.
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	We will set out in our letter of acknowledgment our understanding of the complaint and what the complainant is seeking by way of a resolution. As part of the triaging of complaints, acknowledgement responses must confirm which aspects of the complaint will be considered.	We will acknowledge receipt within 5 working days and inform the complainant of the reference number, who will be investigating, when they can expect a response to be sent to them, etc. If anything is unclear, we will always ask for clarification before beginning the investigation.
5.8	At each stage of the complaints process, complaint handlers must: 1. deal with complaints on their merits, act independently, and have an open mind; 2. give the resident a fair chance to set out their position; 3. take measures to address any actual or perceived conflict of interest; and 4. consider all relevant information and evidence carefully.	Yes	This is set out within the policy statement in the Corporate complaints procedure which can be accessed at www.hillingdon.gov.uk/complaints	
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	Yes	In our letter of acknowledgment, we will advise complainants the date we aim to respond by and if this is not going to be met, we will always	

	about their complaint.		contact them again to advise them if more time is needed.	
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	From April 2024 we keep a log of any reasonable adjustments requested which is held on our Sharepoint	
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	This is set out in the Corporate complaints procedure which can be accessed at www.hillingdon.gov.uk/complaints	
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 received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	All complaint data is stored on our complaint portal called GOSS including pictures, surveys, reports, etc	We also hold a record of the complaint and our responses on Sharepoint
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	Our aim is to resolve a complaint, where we can, either at a Service Request or formal complaint stages. This is set out in the Corporate complaint procedure which can be accessed at www.hillingdon.gov.uk/complaints	
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	We have our “Unreasonable or Unreasonably Persistent complainant” policy which can be accessed at www.hillingdon.gov.uk/complaints	Where restrictions are put in place this information is held on the Council’s Restricted Persons Register
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	We are required to follow the “Unreasonable or Unreasonably Persistent Complainants” Policy	This is set out in the ‘Unreasonable or Unreasonably Persistent Complainants Policy’ and if someone is placed on the Restricted Persons Register (RPR) they are informed of the reason, how long they are on the RPR, how they can appeal

				it, etc. The Corporate Complaints Policy and Procedure review process will include consideration of specific reference to the Equality Act 2010.
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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.	Yes	Corporate complaints procedure sets this out which can be accessed at www.hillingdon.gov.uk/complaints	This is set out in the Council's Corporate Complaints Procedure
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure <u>within five working days of the complaint being received</u> .	Yes	Corporate complaints procedure sets this out which can be accessed at www.hillingdon.gov.uk/complaints	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Corporate complaints procedure sets this out which can be accessed at www.hillingdon.gov.uk/complaints	
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 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Corporate complaints procedure sets this out. www.hillingdon.gov.uk/complaints	Since 1 January 2025, we have a log recording all extensions granted, at what complaint stage and the reason why the extension has been granted.
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	Staff in the complaint handling team ensure that when an extension is granted, the communication to the complainant provides them with the contact details of the Housing Ombudsman Service.	
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	Yes	The complaint response will set out the actions we have taken or if they are due to be taken, when that will happen. Services have in place	For complaints concluded by the Housing Ombudsman Service it is the Complaint and Enquiries Team that tracks

	issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.		procedures to follow up on outstanding actions	actions/orders due for completion. The complaint is only closed once all the actions have been completed and the Ombudsman informed.
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	This is set out in the Corporate complaints procedure which can be accessed at www.hillingdon.gov.uk/complaints	
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 be logged as a new complaint.	Yes	Where additional issues are raised after a complaint has been submitted, we will always add these in and ensure that it is responded to within the original response and if more time is needed to do this, we will inform a complainant of this. If new issues are raised after a response has been sent, we will treat 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: 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 stage 2 if the individual is not satisfied with the response.	Yes	This is included in the response that we send.	

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	This is set out in the Corporate complaints procedure which can be accessed at www.hillingdon.gov.uk/complaints	The formal complaint responses at Stages 1 and 2 will inform a complainant how to progress their complaint to the next stage of the process.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Yes	This is set out in the Corporate complaints procedure which can be accessed at www.hillingdon.gov.uk/complaints	
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to	Yes	This is set out in the Corporate complaints procedure which can be accessed at	We will always ask a complainant for clarification otherwise the response that is

	make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.		www.hillingdon.gov.uk/complaints	sent at Stage 2 will mirror that sent at Stage 1, if we do not know what they are dissatisfied with.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	This is set out in the Corporate complaints procedure which can be accessed at www.hillingdon.gov.uk/complaints	At Stage 1 a Team Leader or Head of Service will investigate and respond and at Stage 2, this will either be a Head of Service or Director, depending on who has investigated and responded at Stage 1.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	This is set out in the Corporate complaints procedure which can be accessed at www.hillingdon.gov.uk/complaints	
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	This is set out in the Corporate complaints procedure which can be accessed at www.hillingdon.gov.uk/complaints	A log is kept of all extensions granted since 1 January 2025 and this includes the reason why an extension was granted.
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.	Yes	Staff in the complaint handling team ensure that an extension communication provides the Housing Ombudsman contact details	
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 issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	The complaint response will set out the actions we have taken or if they are due to be taken, when that will happen. Services have in place procedures to follow up on outstanding actions	
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	This is included in the response that we send.	
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;	Yes	The letters that we send at each stage of the process sets out our findings, the decision, the remedy (where appropriate) and to whom a complainant can request an escalation to including the Ombudsman at the final stage.	

	f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	The Investigating officer will collate information from all relevant staff before issuing our final response	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	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: <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes	This is included in the response that we send	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	This is included in the response that we send	
7.3	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.	Yes	This is included in the response that we send	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	The Complaint Handling Codes are available and key staff have received additional training from an officer in the Local Government and Social Care Ombudsman.	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. 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; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	An annual complaint report is provided for the Corporate Resources & Infrastructure Select Committee . From April 2025, the Resident Services Select Committee will additionally scrutinise an annual report relating to complaints managed by the landlord service during 2024/25.	
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	This is reported to the Corporate Resources & Infrastructure Select Committee. The report is published on the following website: London Borough of Hillingdon - Browse meetings - CABINET	For 2024/25 a separate report will be provided to the Residents' Services Select Committee ahead of the annual submission to the Housing Ombudsman Service.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	A submission is required to Cabinet where any changes are made to the Corporate complaints procedure. We will undertake self-assessments when required.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	As a result of decisions made by the Ombudsman, senior managers are made aware of the decision and actions are monitored to ensure that they are completed. Changes made are then noted and the self-assessment is then changed/added to when next reviewed.	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances,	Yes	This has not happened, but it is noted.	

	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.			
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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	Set out in the Corporate complaints procedure www.hillingdon.gov.uk/complaints	Once a complaint has been responded to, officers will identify any learning and set out what has gone wrong and what is being done to put this right. This includes the identification of any underlining themes and where there are issues associated with perceptions around fairness and respect.
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	Set out in the Corporate complaints procedure which can be accessed at www.hillingdon.gov.uk/complaints	We are using Power BI to provide a suite of reports for staff to access which provides all staff with real time data on complaints received, lessons learnt, compensation paid, etc. This data is then used to make changes to operational practice, the review of services and to inform staff training and development.
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	New complaint portal has been introduced as of 3 July 2023.	Our new complaint portal has been introduced in July 2023 and together with the use of Power BI it enables much more flexible and comprehensive reporting. This will increase the extent to which the council is able to learn from complaints, share the learning and institute improvements. We have a complaint and compliment special interest group and complaints data is reported into our governance structure.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must	Yes	There is a dedicated complaint manager at a senior level that produces the annual complaint report	Quarterly and annual corporate reports show themes and what action was taken to address

	assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.		for the Select committee. This has been enhanced by the new role covered by the Corporate Resources & Infrastructure Select Committee, which will act as the Member Responsible for Complaints.	them. A new IT based system for complaints handling is being installed which will enable much more flexible and comprehensive reporting. This will increase the extent to which the council is able to learn from complaints, share the learning and institute improvements
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	Corporate Resources & Infrastructure Select Committee, which will act as the Member Responsible for Complaints	From 2024/25 this will be added to by a timelier report into Residents' Services Select Committee ahead of the submission to the Housing Ombudsman Service
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	A quarterly report has been developed that provides the Corporate Resources & Infrastructure Select Committee, with regular updates.	A rolling quarterly report is also produced for the landlord board, Corporate Management Team leads and lead Cabinet member for the landlord service.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> 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	A quarterly report is being used to provide the Corporate Resources & Infrastructure Select Committee with regular updates.	This process was approved by Cabinet on 27 June 2024. Rolling quarterly report is also produced for the landlord board, Corporate Management Team leads and lead Cabinet member for the landlord service
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; 	Yes	"The Council is committed to putting people at the centre of everything we do and aims to provide the best possible service to residents. However, sometimes things can go wrong and if you are not happy with the service you have received from the Council then please tell us so that we can,	We have a standard housing objective in relation to complaints which is also incorporated in our procedures and explains that staff involved in the management and response

	<p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>		<p>where possible, sort out the problem.</p> <p>We will carry out enquiries fairly, deal with your complaint as quickly and effectively as we can while maintaining confidentiality and keeping you informed of progress. We want to reassure you that the service you get will not be affected if you raise concerns or make a complaint.</p> <p>The policy and procedure:</p> <ul style="list-style-type: none">• allows managers to address issues of unsatisfactory service and seek improvements in service delivery;• ensures that customers are treated fairly and consistently;• ensures that a proper and adequate investigation takes place before any action is taken;• requests for reasonable adjustments will be considered in line with the Equality Act 2010 and appropriate training is provided for staff; and• safeguards the integrity and good reputation of the Council.”	<p>to complaints are responsible for:</p> <ul style="list-style-type: none">• working collaboratively to resolve resident issues• taking shared responsibility for addressing areas of development identified through complaints• Acting in accordance with any relevant professional registration that they hold.
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Appendix D - updated Complaints Action Plan which was produced following the 2023/24 self-assessment against the Complaints Handling Code and published in June 2024

Task / Code reference	Lead	By	Update	RAG
Introduce a dedicated ‘complaints resource’ within Housing Management as part of a phase approached to supporting improved outcomes and learning from the management of formal complaints.	SS	2025/26	Housing Management restructure approved, including dedicated complaints resource. Restructure Project Plan in development.	A
<p>Self-Assessment</p> <p>Sect 9 – Scrutiny & oversight; continuous learning and improvement.</p> <p>Non- compliance regarding specific wording within relevant JDs – task to include standard objectives / form of words relating to complaint handling into the JDs of all Officers who deal with complaints.</p> <p>HoS references include:</p> <ol style="list-style-type: none"> Have a collaborative and cooperative approach towards resolving complaints, working with colleagues across teams and departments Take collective responsibility for any shortfalls identified through complaints, rather than blaming others Act within the professional standards for engaging with complaints as set by any relevant professional body <p>Revised standard objectives – October ’24.</p> <ul style="list-style-type: none"> Foster a collaborative and cooperative approach towards resolving complaints by working with colleagues across teams and departments in an open and honest way. Take collective responsibility for any shortfalls identified through complaints, rather than attributing blame to others. Adhere to professional standards when engaging with complainants. Ensure that deadlines are consistently met. Demonstrate integrity when interacting with complainants and colleagues. To attend the complaint handling masterclass, which is offered four times annually. 	SS	2025/26	<p>Work on new / revised Job descriptions / Person Specifications to be incorporated within the Restructure project – see above.</p> <p>Corporate Management instruction issued in April 2025 to all staff who management complaints and requirements to also be embedded into 2025/26 staff and manager PADAs.</p>	A
<p>Make clear and include in the STAR survey that the survey is not a channel by which complaints are collected/processed.</p> <p>Repairs and other Services to also incorporate this in their surveys – option to signpost them to the appropriate channels.</p>	MF GP/SS	Aug 24 Oct 24	Surveys updated.	G
Code provision 3.5 - Publicising policy – we publicise this in a limited way in that our policy and code is on our website; we will be exploring how to publicise more widely through presentations and newsletters – The first edition of our new quarterly e-newsletter (May 24) referenced complaints processes.	MF/IA	Ongoing	Initiatives to increase overall compliant numbers to be rolled forward into Complaints Improvement Plan 2025/26	A
Code provision 5.6 – acknowledgement letter – Review and increase the scope of the letter to include not only receipt of a complaint but sets out our understanding of the complaint in summary form.	IA	Oct 24	Updated text [GOSS] to insert into template. Templates updated 2.9.24 and compliant	G
Code provision 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.	IA	Oct 24	Updated text [GOSS] to insert into template. Templates updated 2.9.24 and compliant	G
Code provision 5.10 - set up a log or a register of complaints where reasonable adjustments have been made (ref Equality Act) – disabled/vulnerable residents.	IA	Aug 24	Register established in SharePoint - Completed	G

Code provision 8.1 – An Annual Complaints Performance and Service Improvement report for scrutiny and challenge which includes: a. The annual self- assessment against this Code to ensure the complaint handling policy remains in line with its requirements b. A qualitative and quantitative analysis of the Landlord’s complaint handling performance – this must include a summary of the types of complaints the landlord has refused to accept c. Any findings of non-compliance with this Code by the ombudsman d. The service improvements made as a result of the learning from complaints e. Any annual report about the landlord’s performance from the ombudsman f. Any other relevant reports or publications produced by the ombudsman in relation to the work of the Landlord	RS/DW	June 25	Final 24/25 report to be uploaded to the Housing Ombudsman Service by 30 June 25. Report to be ready in advance to ensure prior consideration and scrutiny by ‘governing body’. Timeline to be documented for consideration by; Landlord Board, CMT Housing Leads, Cabinet portfolio holders, Residents Services Select Committee. NB – Corporate Resources & Infrastructure Select Committee now formally recognised as the ‘Member Responsible for Complaints’ and will consider the Corporate Complaints Report each Autumn. This will include prior consideration by Residents Services Select Committee in April each year.	A
Code provision 8.2 – Requirement to define our governing body. To be documented as an integral part of the annual timeline for Complaints and must include ‘tenant scrutiny’.	IA/DW	17 Sept 24	Annual timeline ‘signed off’ by LL Board on 17.9.24.	G
The annual complaints performance and service improvement report must be reported to the landlord’s governing body (or equivalent) and published on the section of its website relating to complaints. The governing body’s response to the report must be published alongside this.	SS/GP	30 June 25	See above.	A