

# Housing Complaints Performance and Service Improvement Report

June 2024



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## 1. Introduction

Hillingdon Council is required to comply with the Housing Ombudsman's Complaint Handling Code and to demonstrate compliance on at least an annual basis. This document is our annual complaints performance and service improvement report, which forms part of our Annual Submission to the Housing Ombudsman. The report includes:

- Our latest self-assessment of compliance against the requirements of the Housing Ombudsman's Complaint Handling Code.
- An analysis of complaint handling performance in the year from 1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024.
- Findings of non-compliance with the Code by the Ombudsman between April 2023 and 2024.
- Learning from Complaints and Service improvements.

The annual complaints performance and service improvement report is reported annually to a Senior Officer level Landlord Board, Corporate Management Team, the two Cabinet Leads with responsibility for Housing, and Residents' Services Select Committee. The report is shared for feedback with our Tenant Complaints Special Interest Group and is published on the council's website at [Complaints - Hillingdon Council](#). Information from the report is also shared more widely with tenants. Moving forward, from the next submission year 2025/26, the dates of these meetings will be aligned to maximise the potential for review and examination prior to final submission to the Housing Ombudsman Service.

## 2. Summary of Self-Assessment against Housing Ombudsman Complaint Handling Code as last revised 17 April 2024

A completed self-assessment form is included at appendix A.

### Section 1: Definition of a complaint - Compliant

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."*

### Section 2: Exclusions - Compliant

- although a complaint can be submitted against Council **policy**, please be aware 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.

### **Section 3: Accessibility and Awareness - Compliant**

Complaints can be made quickly and easily 24 hours a day, seven days a week via our website at [www.hillingdon.gov.uk/complaints](http://www.hillingdon.gov.uk/complaints). If an adjustment is needed complainants are asked to call the complaint team.

### **Section 4: Complaint Handling Staff - Compliant**

All staff within the team are experienced and fully trained to deal with complaints and any adjustments that are required. In addition, they have been provided with additional training by a member of staff from the Local Government and Social Care Ombudsman on 16 May 2024.

### **Section 5: The Complaint Handling Process - Compliant**

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 Codes 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.

### **Section 6: Complaints Stages - Compliant**

As a result of the Complaint Handling Codes, we now have a Service Request step and 2 formal complaint stages, after which the complainant can apply to the Ombudsman.

### **Section 7: Putting things right - Compliant**

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 as a result 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.

### **Section 8: Self-assessment reporting and compliance - Compliant**

Our self-assessment will be published on the complaint page [www.hillingdon.gov.uk](http://www.hillingdon.gov.uk)

**Section 9: Scrutiny & Oversight: continuous learning and improvement – one area of non-compliance** regarding specific wording within relevant job description. Full compliance to be achieved by December 2024.

The Member Responsible for Complaints (MRC) will be a role performed by the Corporate Resources & Infrastructure Select Committee.

## **3. Analysis of Complaint Handling Performance 1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024**

Our annual reporting cycle for complaints includes a corporate complaints report to the Corporate Resources and Infrastructure Select Committee in the Autumn. From the 2024/25 reporting cycle an earlier report related specifically to housing services will be considered by Residents' Services Select Committee in advance of the annual June submission date for the Housing Ombudsman.

In line with other housing providers complaints, a high proportion of complaints are focused on housing repairs. Reports in this area track data monthly and are actively reviewed and monitored by Landlord Board.

Between April 2023 and March 2024, a total of 133 complaints regarding housing repairs were received, 101 stage 1 and 32 stage 2 complaints. There were 47 complaints regarding repairs upheld and 28 partially upheld. There were 22 complaints that were mainly about damp and mould.

In the first two months of 2024/25 there have been 86 complaints, 75 stage 1 and 11 stage 2. This is an average of 43 housing repairs complaints per month compared to an average of 11 in 2023/24. This follows changes made to our Corporate Complaints Policy and Procedure (see below). In the first two months of this year, 12 complaints have been upheld and a further 29 partially upheld. There have been 9 complaints that are mainly about damp and mould.

## **4. Findings of non-compliance with the Code 1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024**

In one case (202210650) the Ombudsman expressed concern at the number of Stages that were contained within the Corporate complaints procedure, our application of escalation to the Ombudsman from Stage 1 and that in a few cases we had incorrectly signposted complainants to the wrong Ombudsman. The Council's

Corporate complaints procedure has been revised and now meets both Ombudsman Complaint Handling Code.

## **5. Learning from Complaints and Service improvements linked to complaints management**

Continuous improvement is seen as a cornerstone of how we operate at Hillingdon Council and learning from complaints is a central part of this. The receipt of any complaint provides Hillingdon with valuable feedback, an opportunity to learn from what has happened, to make adjustments so that it does not happen again and by doing so improve the service we provide our residents. To this end, we have paid for a bespoke training course on investigating complaints, the processes to follow, appropriate redress to offer but also mechanisms they use to identify issues and make recommendations for change/service improvement. Officers found this course extremely helpful.

The Council has invested in new software for complaint handling. Since July 2023, we have been using a new complaint portal to process and manage complaints. The new portal has provided us with the opportunity to better understand feedback we are receiving from our residents through the “Report It” data we receive, complaints, compliments and Members Enquiries. This will enable improved analysis to better understand the specific issues that residents are raising through these mediums and identify trends which in turn will help us to address systemic problems at an early stage, without the need to escalate to the formal complaint stages or to Members. It is envisaged that this analysis could be used to identify gaps in staff knowledge, skills or processes and then develop training programs that could be tailored to meet a specific need.

Going forward, a Customer Experience Contact report covering both service request and complaint analysis will be developed, with the aim of identifying issues before they escalate into complaints and by doing so reduce the burden on our resources and a culture where service improvement is seen as the norm.

Our Corporate Complaint Handling Policy and Procedure has also been updated. The adoption of the same Complaint Handling Code by both the Housing Ombudsman and the Local Government and Social Care Ombudsman has been helpful in providing a consistent basis for housing and corporate complaint handling. There are now only 2 stages to the process and there are no longer ‘informal complaints’, just complaints and service requests. This has resulted in an increase in complaints activity providing richer feedback to inform service improvement.

The Housing Management Service has comprehensively reviewed its approach to learning from complaints and earlier this year rolled out a revised approach to monitoring complaints and evidencing learning outcomes. Relevant service managers and the complaints manager have been involved in developing and implementing the approach. The stated objective of the approach is ‘to enhance the council’s approach to handling and monitoring complaints in a fair and transparent manner, ensuring continuous improvement through identified learning outcomes’. The process covers extracting data from our new system, GOSS; organising this into a structured spreadsheet and filtering to share with relevant service managers. An online learning

log form has been created for service managers to complete to capture learning outcomes identified and any changes to services, policies or procedures identified as a result.

Collectively housing managers and Landlord Board collate and review the Learning Outcome forms and identify common themes and areas for improvement. These are then prioritised and necessary changes to services, policies and procedures are implemented. The effectiveness of changes is monitored and reported on.

This structured approach ensures that complaint handling is systematic, with clear steps for extracting, filtering, and sharing data. By requiring service managers to complete the Complaints Learning Outcome form, the process ensures that each complaint is thoroughly reviewed and leads to actionable improvements. Continuous monitoring and reporting uphold transparency and demonstrate the council's commitment to service excellence.

The Repairs and Voids Team keep a learning log from complaints and quarterly meetings are held to review and track changes to processes and procedures. There is a commitment to continuous learning and several changes have been made and embedded into service provision.

## Appendix A: Hillingdon Council Self-Assessment Form: Housing Ombudsman Complaint Handling Code – Completed June 2024

### Section 1: Definition of a complaint

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation   |
|----------------|--|------------------|--|--|
| 1.2            | A complaint must be defined as:<br><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<br><a href="#">Complaints - Hillingdon Council</a><br>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. |  |
| 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   | 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                                       | The Council makes a distinction between a service request and a complaint.                       |



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|     | complaints, but must be recorded, monitored and reviewed regularly.  |     | responded to or not. We keep records of Service Requests submitted and their outcome.  |   |
| 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 <a href="http://www.hillingdon.gov.uk/complaints">www.hillingdon.gov.uk/complaints</a> |   |
| 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 generally 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:<br><a href="http://www.hillingdon.gov.uk/complaints">www.hillingdon.gov.uk/complaints</a> | The Policy and Procedure includes the following text:<br>"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"> <li>The issue giving rise to the complaint occurred over twelve months ago.</li> <li>Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>Matters that have previously been considered under the complaints policy.</li> </ul> | Yes              | This is included in the Corporate complaints procedure and contained within the complaint page:<br><a href="http://www.hillingdon.gov.uk/complaints">www.hillingdon.gov.uk/complaints</a>   | The Complaints Policy includes the following text:<br>"We will not deal with issues through the complaint procedure where a claim has been made in a court such as a disrepair claim"  |

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| 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 | <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 the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint. | Yes | Included within the Corporate complaint's procedure         | In practice a letter is sent if a complaint is not accepted and the policy states<br><br><i>"If we do not intend to 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  | Complaints can be made in person, by telephone, in writing, via our website or email. In addition, the policy document also states that <i>"If you need an adjustment to be made, please call the complaint team."</i> |
| 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                          | <a href="#">Handling council complaints (sharepoint.com)</a>   |
| 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              | Since the introduction of the new Complaint Handling code and the removal of Informal complaint stage, volumes of formal complaints have risen significantly.                |  |
| 3.4            | Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two-stage process, what will happen at each stage, and the timeframes for   | Yes              | Published on our website and it sets out the 2 Stage Corporate complaints procedure – <a href="http://www.hillingdon.gov.uk/complaints">www.hillingdon.gov.uk/complaints</a> |  |

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|     | responding. The policy must also be published on the landlord's website.   |     |  |   |
| 3.5 | The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.                                       | Yes | The Corporate complaints policy is published on our website and recently advertised in our E-newsletter in May 2024. The policy contains information about both Ombudsman and the Codes are 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 | Corporate complaints procedure sets this out   | 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  |   |

## 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 process all complaints and the annual complaint report is put before the Finance and Corporate Services Select Committee for scrutiny. | 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 resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.   | Yes              | A centralised complaint team is responsible for engaging with staff at all levels and where there are issues, they have access to senior managers for support and resolution.                  | We have a Corporate complaint handling team that is responsible for processing complaints, providing advice and guidance, delivering training sessions for officers across the Council and in attending management   |

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|     |   |     |   | 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 <a href="http://www.hillingdon.gov.uk/complaints">www.hillingdon.gov.uk/complaints</a> |   |

## 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 <a href="http://www.hillingdon.gov.uk/complaints">www.hillingdon.gov.uk/complaints</a> |                          |
| 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.                     |                          |



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| 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.  |  |
| 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. |  |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.   | Yes | We will process in accordance with the Corporate complaints procedure.   |  |
| 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   | 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. |
| 5.7 | 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 | This will be set out in the acknowledgment   | 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   |

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|      |  |     |   | unclear, we will always ask for clarification before beginning the investigation. |
| 5.8  | At each stage of the complaints process, complaint handlers must: <ol style="list-style-type: none"> <li>1. deal with complaints on their merits, act independently, and have an open mind;</li> <li>2. give the resident a fair chance to set out their position;</li> <li>3. take measures to address any actual or perceived conflict of interest; and</li> <li>4. consider all relevant information and evidence carefully.</li> </ol> | Yes | This is set out within the policy statement in the Corporate complaints procedure   |   |
| 5.9  | Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.   | Yes | 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 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 Sharepoint   |   |
| 5.11 | Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid   | Yes | Set out in the Corporate complaints procedure   |   |

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|      | 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.   |     |  |   |
| 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   |   |
| 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                            |   |
| 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 <a href="http://www.hillingdon.gov.uk/complaints">www.hillingdon.gov.uk/complaints</a> | 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 where someone is placed on the Restricted Persons Register (RPR), they are |

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|  |  |  |  | <p>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.</p> |
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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 | 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 <b><u>within five working days of the complaint being received</u></b> .  | Yes              | Corporate complaints procedure sets this out |   |
| 6.3            | Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.  | Yes              | Corporate complaints procedure sets this out |   |
| 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  | Yes              | Corporate complaints procedure sets this out |   |

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|     | reason(s) must be clearly explained to the resident.   |     |  |  |
| 6.5 | When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.   | Yes | Staff in the complaint handling team ensure that an extension communication provides the Housing Ombudsman contact details.  |  |
| 6.6 | A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.  | Yes | 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   |  |
| 6.7 | 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  |  |
| 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. |  |

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| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:<br>a. the complaint stage;<br>b. the complaint definition;<br>c. the decision on the complaint;<br>d. the reasons for any decisions made;<br>e. the details of any remedy offered to put things right;<br>f. details of any outstanding actions; and<br>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. |  |
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## 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 |  |
| 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 |  |
| 6.12           | Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response. | Yes              | This is set out in the Corporate complaints procedure | We will always ask a complainant for clarification otherwise the response that is sent at Stage 2 will mirror that sent at Stage 1, if we do not |

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|      |   |     |  | 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  |                                       |
| 6.14 | Landlords must issue a final response to the stage 2 <b>within 20 working days</b> of the complaint being acknowledged.   | Yes | This is set out in the Corporate complaints procedure  |                                       |
| 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  |                                       |
| 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.   |                                       |



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| 6.19 | <p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ol style="list-style-type: none"> <li>the complaint stage;</li> <li>the complaint definition;</li> <li>the decision on the complaint;</li> <li>the reasons for any decisions made;</li> <li>the details of any remedy offered to put things right;</li> <li>details of any outstanding actions; and</li> <li>details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ol> | Yes | <p>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 escalation to including the Ombudsman at the final stage.</p> |  |
| 6.20 | <p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>  | Yes | <p>The Investigating officer will collate information from all relevant staff before issuing our final response</p>  |  |

## Section 7: Putting things right

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation |
|----------------|--|------------------|--|--------------------------|
| 7.1            | <p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> <li>Apologising;</li> <li>Acknowledging where things have gone wrong;</li> </ul> | Yes              | <p>This is included in the response that we send</p> |                          |

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|     | <ul style="list-style-type: none"> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul> |     |   |  |
| 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            | <p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul> | Yes              | <p>An annual complaint report is provided for the <a href="#">Corporate Resources &amp; Infrastructure Select Committee</a></p> |  |
| 8.2            | <p>The annual complaints performance and service improvement report must be reported to the landlord's governing body</p>  | Yes              | <p>This is reported to the Corporate Resources &amp; Infrastructure Select Committee. The report is published</p>               | <p>From 2024/25 a separate report will be provided to the Residents' Services Select</p> |

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|     | (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.  |     | on the following website: <a href="#">London Borough of Hillingdon - Browse meetings - CABINET</a>   | 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 as a result when next reviewed. |  |
| 8.5 | If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code. | Yes | This has not happened, but is noted.   |  |

## 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   | 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.  |
| 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   | Customer Experience Contact report covering both service request and complaint analysis will be developed, with the aim of identifying issues before they escalate into complaints and by doing so reduce the burden on our resources and a culture where service improvement is seen as the norm. |
| 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  | Our new complaint portal has been introduced in July 2023 and 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   |
| 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 | Quarterly and annual corporate reports show themes and what action was   |

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|     | assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.  |     | report 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. | taken to address them.<br><br>A new IT based system for complaints handling has been 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 implement 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 | The intention is to provide the Corporate Resources & Infrastructure Select Committee, with regular updates but this has not yet been determined.  |   |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive:<br>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;   | Yes | This is before Cabinet on 27 June for formal approval  | The Business Manager for complaints provides quarterly and annual reports.  |

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|            | <ul style="list-style-type: none"> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d. annual complaints performance and service improvement report.</li> </ul>  |           |  |   |
| <p>9.8</p> | <p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul> | <p>No</p> | <p>The central team responsible for handling complaints, the Appeals and Complaints Team and the Homeless Prevention Team dedicated to handling complaints, all have objectives in relation to the handling of complaints. However, this is not the case for all staff that deal with complaints across the Council, and this is something that we will need to work on. However, the Council’s Corporate complaints procedure sets out that:</p> <p>“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, where possible, sort out the problem.</p> | <p>Full compliance to be achieved by Dec 2024</p> |

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|  |  | <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"> <li>● allows managers to address issues of unsatisfactory service and seek improvements in service delivery;</li> <li>● ensures that customers are treated fairly and consistently;</li> <li>● ensures that a proper and adequate investigation takes place before any action is taken;</li> <li>● requests for reasonable adjustments will be considered in line with the Equality Act 2010 and appropriate training is provided for staff; and</li> <li>● safeguards the integrity and good reputation of the Council.”</li> </ul> |  |
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| <b>Effective from:</b> | 28 June 2024   | <b>Review Date:</b> | June 2025 |
| <b>Report Owner:</b>   | Dan Kennedy, Corporate Director – Central Services         |                     |           |
| <b>Report Author:</b>  | Ian Anderson, Business Manager – Complaints and Enquiries  |                     |           |
| <b>Approved by:</b>    | Landlord Board and Corporate Management Team Housing Leads |                     |           |
| <b>Version Number:</b> | 1.01   |                     |           |