



Council Management Team
13 August 2025

**Report from the Corporate Director
of Finance and Resources**

**Lead Cabinet Member - Cabinet Member
for Housing and Residents Services,
(Cllr. Fleur Donnelly-Jackson)**

**Housing Management Complaints Performance and Service
Improvement Annual Report 2024/2025**

Wards Affected:	All
Key or Non-Key Decision:	Non-Key Decision
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
List of Appendices:	Appendix 1 – Housing Ombudsman’s performance report for Brent 2023/2024 Appendix 2 – Council’s Self-Assessment against the Housing Ombudsman’s Complaint Handling Code Appendix 3 – Knowledge and Information Management spotlight report Appendix 4 – Attitudes, Respect and Rights spotlight report Appendix 5 - Council’s updated Complaints Policy
Background Papers:	N/A
Contact Officer(s): (Name, Title, Contact Details)	Mariza Barros Complaints and Casework Manager Brent Council 0208 937 1381

1.0 Executive Summary

- 1.1 This annual report sets out complaints performance for the Housing Management service for the period 1 April 2024 to 31 March 2025. The report focuses on volumes of complaints, complaint outcomes, compensation offered, nature of complaints and learning and service improvements as a result. Complaints regarding housing management fall under the Housing Ombudsman and therefore a separate report has been prepared for this purpose.
- 1.2 The report also contains the Housing Ombudsman’s performance report for Brent for 2023/2024 (Appendix 1) and the Council’s self-assessment against the Housing Ombudsman’s Complaint Handling Code (Appendix 2).

2.0 Recommendation(s)

- 2.1 CMT are asked to note Brent Housing Management's performance in managing and resolving complaints.
- 2.2 CMT are asked to note, and review Brent's latest self-assessment against the Housing Ombudsman's updated Complaint Handling Code.
- 2.3 CMT are asked to note and review the latest updates to the Council's Complaints Policy.
- 2.4 CMT are asked to approve progressing the report to Cabinet and the relevant Scrutiny Committees.

3.0 Background

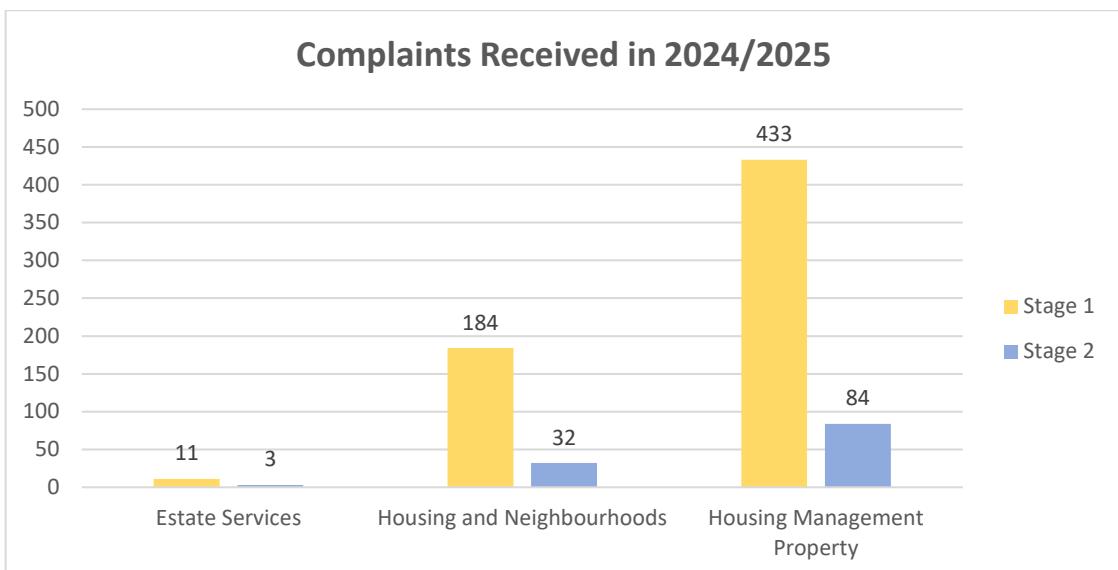
- 3.0.1 The Council's corporate complaints fall under two separate governing bodies, the Housing Ombudsman and the Local Government and Social Care Ombudsman (LGSCO). Complaints relating to Housing Management fall under the Housing Ombudsman and complaints about any other service fall under the LGSCO.
- 3.0.2 This report focusses on complaints that fall under the Housing Ombudsman only.
- 3.0.3 The main performance headlines from Housing Management complaints are as follows:
 - 628 complaints were received at the initial stage of the complaints process in 2024/2025, an increase of 9% on 2023/2024. 119 stage 2 complaints were received in the same period, which is the same as last year.
 - The majority of issues raised related to service failure (77%, 480 complaints) and more specifically delay in a service being provided which accounted for 275 complaints.
 - Many of the complaints were escalated to stage 2, because the complainant did not agree with the decision at stage 1. This was the reason in 39% of cases that were escalated.
 - 206 complaints were upheld at stage 1 and 279 complaints partly upheld which provides a 64% uphold rate.
 - 83% of stage 2 cases were upheld or partially upheld.
 - 65 complaints were rejected at stage 1 and 1 complaint was rejected at stage 2. In 59 of the stage 1 cases, the complaint was rejected because it was a duplicate request or had already been investigated.
 - 96% of all stage 1 Housing Management complaints were responded to on time and 99% of stage 2 complaints were responded to on time.
 - A total of £109,787 was paid out in compensation at stage 1 and 2.

Housing Management Stock

3.0.4 The Housing Management service currently manage 13,482 properties which are a mixture of tenanted and leasehold properties. As a housing landlord, Brent manages 11,076 flats and maisonettes, 2210 houses and bungalows, as well as 196 New Accommodation for Independent Living (NAIL) properties. In addition, the service manages 24 rooms, 3 temporary accommodation properties and 31 traveller sites.

Complaints Received

3.0.5 In 2024/2025, the Housing Management service received 628 stage 1 complaints compared to 575 the previous year, which is an increase of 9% (52 complaints).



3.0.6 Estate Services has now moved under the Public Realm directorate and therefore data on complaints for this area has been provided separately. Estate Services received 11 stage 1 complaints and 3 stage 2 complaints in 2024/2025. The escalation rate for complaints received by Estate Services is 27% with 3 out of 11 complaints escalated to stage 2. Housing and Neighbourhoods received 184 stage 1 complaints in 2024/2025 which is 54 more complaints than the previous year albeit Estate Services sat within this department the previous year. In the same period the Housing and Neighbourhoods received 32 stage 2 complaints which is 8 less than the previous year. This provides an escalation rate of 17% which is 1% less than the previous year. In 2024/2025 433 stage 1 complaints were received and 84 stage 2 complaints which is 12 less stage 1 complaints, and 11 less stage 2 complaints compared to the previous year. The escalation rate for Housing Management Property complaints was 19% which is 2% less than the previous year. In 2023/2024 a total of 119 stage 2 complaints were received which is the same number of complaints escalated as 2023/2024 and one more than 2022/2023.

Nature / Reasons for Complaints

3.0.7 We record root causes of complaints at stage 1 once a complaint has been closed, therefore we look at the complaints that were closed in 2024/2025 rather than received. This is why the total number of complaints that we have recorded root causes for is 626 which is slightly less than the 628 complaints received at stage 1.

3.0.8 The Council classifies root causes of complaints into three main areas: Communication, Policy/Procedures, and Service Failure.

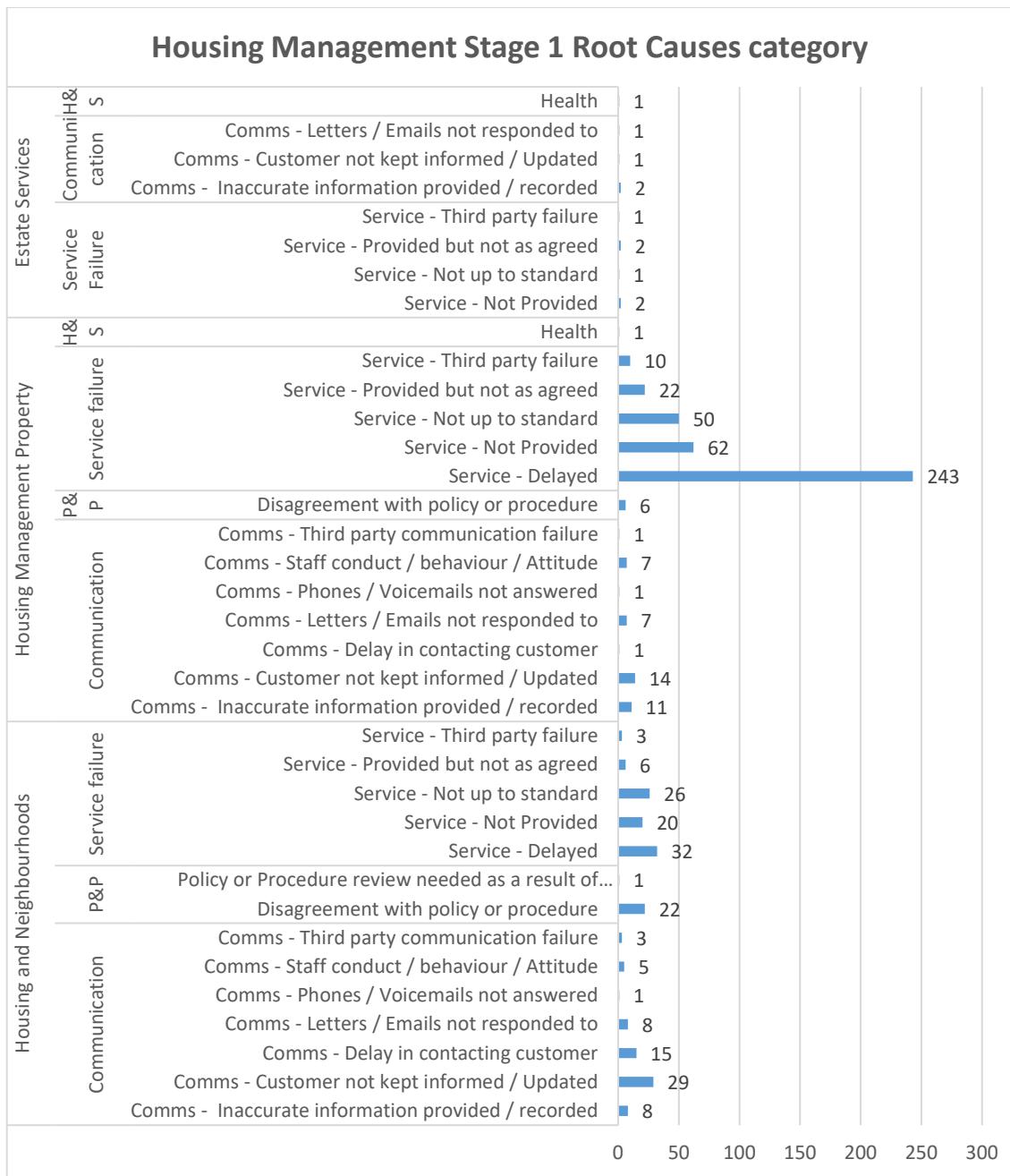
3.0.9 The data below shows that for Housing and Neighbourhoods, 49% of complaints (87 out of 179) were due to service failures and that this was primarily related to services being delayed (32 complaints) or service being perceived as not up to standard (26 complaints). Communication issues constituted 39% of the complaints (69 out of 179) which is the same percentage as last year, with the predominant issue being that customers were not kept informed or updated. Policy/procedure was the root cause for 13% of complaints for Housing and Neighbourhoods. All bar one complaint in this category disagreed with the policy or procedure that was in place.

3.0.10 In comparison, for Housing Management Property 89% of complaints (387 out of 436) were due to service failures which is similar to the percentage last year, with delays in service provision continuing to be the main issue (243 complaints, 63% in this category). The second highest root cause for Housing Management Property was communication. Communication issues made up 10% of the complaints (42 complaints) and this mainly related to the resident not being kept informed or updated (14 complaints, 33% in this category), and inaccurate information provided or recorded (11 complaints, 26% in this category). Issues with policy/procedure were less prevalent at 1% with 6 complaints disagreeing with the policy or procedure in place which is the same as last year.

3.0.11 In 2024/2025, 11 Estate Services complaints were closed, 6 complaints related to service failure, 4 complaints related to communication and one complaint related to Health. There were no complaints received which related to policy or procedure.

3.0.12 Overall, across Housing Management, service failure was the most common root cause for complaints. Service failure accounted for 77% of all complaints received at stage 1 (480 out of 626). Service being delayed was the most common cause of complaints within this category with 275 complaints. Service Failure being the main reason for complaints remains consistent with other local authorities.

3.0.13 Communication issues accounted for 18% of the overall complaints (115 complaints), policy/procedure issues accounted for 5% (29 complaints) and Health accounted for less than 1% with only two complaints received, however this is a new category that has been introduced so there will likely be more complaints categorised in this category next year.



3.0.14 A list of the specific issue types that complaints were categorised under has been provided below to provide more context and further analysis.

Root cause and issue type	Number of complaints
Service Failure	480
Repairs To My Property (Including Inspections)	123
Outstanding Repairs - Other	100
Communal Repair	59
Damp and/or mould	43
Housing Customer - Other	27
Anti - Social Behaviour	20
Complaints about Wates	16
Leasehold Enquiries	13

Gas Safety	8
Asbestos Safety	6
Electrical Safety	6
Estate Services	6
Planned Maintenance Of My Property	6
Service Failure	6
Communal Cleaning	4
Complaints about PS Staff	4
Poor Customer Service	4
Right To Buy	4
Complaints about Oakray	3
Grounds Maintenance	3
Water Safety	3
Billing	2
Lettable standard	2
Arrears	1
Banding	1
Bedroom Entitlement	1
Cleaning schedule	1
Estate Parking	1
Lettings process	1
Lift Safety	1
My New Home	1
My Personal & Household Details	1
Overcrowding	1
Rent Refund	1
Tree Maintenance	1
Communication	115
Housing Customer - Other	25
Anti - Social Behaviour	15
Outstanding Repairs - Other	11
Repairs To My Property (Including Inspections)	10
Communal Repair	8
Grounds Maintenance	7
Water Safety	5
Estate Services	4
Poor Customer Service	4
Complaints about PS Staff	3
Sound Insulation	3
Communal Cleaning	2
Complaints about Wates	2
Leasehold Enquiries	2
Noise Nuisance	2
Parking	2
Arrears	1
Asbestos Safety	1
Banding	1
Electrical Safety	1

Estate Parking	1
Overcrowding	1
Payment / Arrears	1
Rent Refund	1
Right To Buy	1
Service Failure	1
Policy / Procedures	29
Arrears	5
Repairs To My Property (Including Inspections)	5
Anti - Social Behaviour	4
Payment / Arrears	4
Housing Customer - Other	2
Parking	2
Rent Refund	2
Billing	1
My Personal & Household Details	1
Outstanding Repairs - Other	1
Poor Customer Service	1
Right To Buy	1
Health	2
Communal Cleaning	1
Repairs To My Property (Including Inspections)	1
Grand Total	626

Reasons for escalation

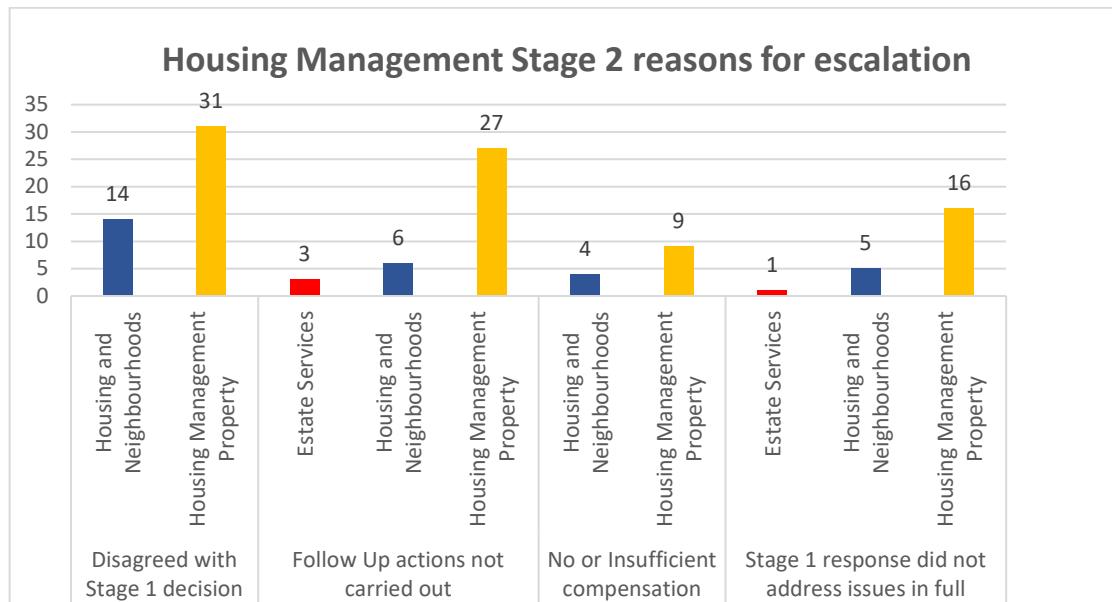
3.0.15 In 2024/2025, 29 escalated complaints were closed for Housing and Neighbourhoods. The most frequent reason for escalation was disagreement with the stage 1 decision, accounting for 48% of complaints. Other reasons included follow-up actions not being carried out (6 complaints, 21%), the stage 1 response did not address issues in full (5 complaints, 17%), and that no or insufficient compensation (4 complaints, 14%).

3.0.16 There were 83 escalated complaints closed for Housing Management Property. Similar to Housing and Neighbourhoods, the leading reason for escalation was disagreement with the stage 1 decision, which had 31 complaints and accounted for 37% of the escalated complaints. The second reason was follow-up actions were not carried out which was closely behind with 27 complaints, which accounted for 33% escalations. Additional reasons were the stage 1 response did not address the issues in full (16 complaints, 19%), and that no or insufficient compensation was awarded at stage 1 (9 complaints, 11%).

3.0.17 Four escalated complaints were closed in 2024/2025 for Estate Services with the reasons for escalation being follow up actions not carried out (3 complaints, 75%) and the Stage 1 response did not address issues in full (1 complaint, 25%)

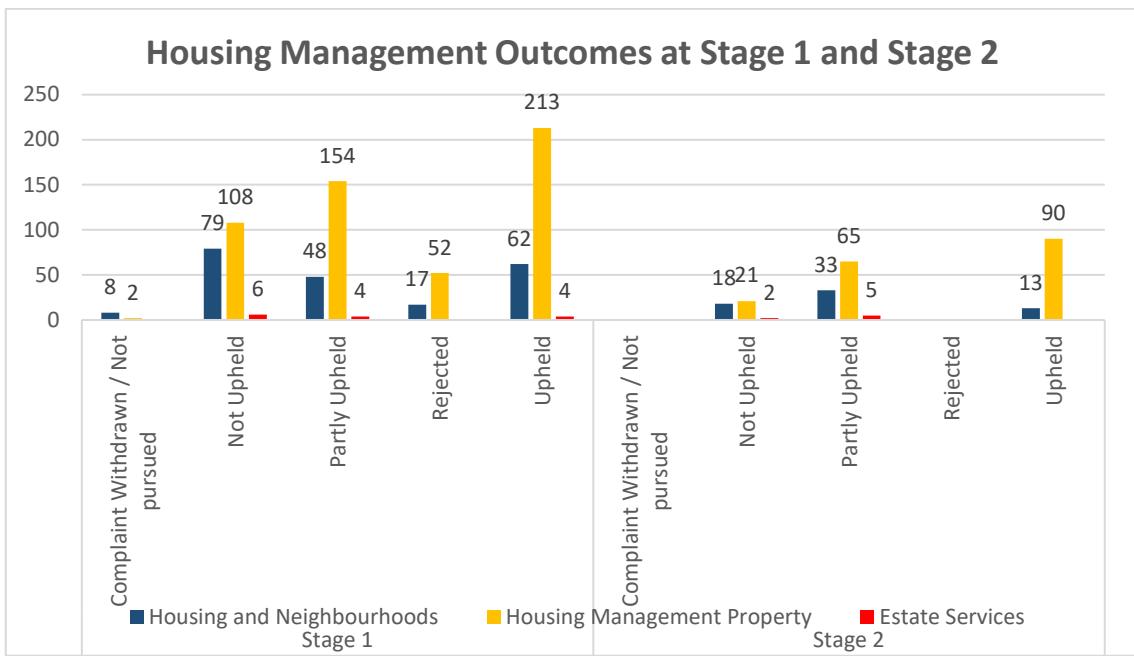
3.0.18 Overall, 116 complaints that were escalated to stage 2 were closed in 2024/2025. The most common reason for escalation was disagreement with

the stage 1 decision, with 45 complaints (39% of all complaints), followed by follow up actions not being carried out, 36 complaints (31% of all complaints), Stage 1 response did not address issues in full, with 22 complaints (19% of all complaints) and no or Insufficient compensation, with 13 complaints (11% of all complaints).



Complaint Outcomes

3.0.19 The chart below shows the outcome of complaints at stage 1 and final review stage:



3.0.20 The Council has the following outcomes that can be selected on the Council's complaints system: Upheld, Partly Upheld, Not Upheld, Rejected and Complaint Withdrawn/Not pursued. Where a complaint is partly upheld, this means that there may have been an aspect of the complaint that was upheld but the main substance of the complaint was not upheld. This allows for better analysis to be carried as to why complaints are upheld, however all complaints that are upheld or partly upheld are deemed upheld as there has still been some fault on the part of the Council.

3.0.21 At stage 1 of the complaints process, for Housing and Neighbourhoods, 48 complaints were partly upheld (22%) and 62 were upheld (29%), resulting in 51% of complaints being either upheld or partly upheld overall. Although this is similar to last year percentage wise, there were 110 complaints upheld or partly upheld compared to 66 in 2023/2024.

3.0.22 For Housing Management Property at stage 1, 154 complaints were partly upheld (29%) compared to 46 the previous year which equated to 10%. There were 213 upheld complaints (40%) compared to 270 complaints last year with an overall rate of 58%. Overall, 329 complaints were upheld or partly upheld in 2024/2025 resulting in a 69% uphold rate.

3.0.23 Estate Services closed 14 complaints in 2024/2025, partly upholding and upholding an equal number of complaints (4 complaints) providing an uphold rate of 57%.

3.0.24 Overall, 485 complaints were upheld out of 757 complaints closed in 2024/2025. This results in a 64% uphold rate which is an increase of 5% compared to 2023/2024.

3.0.25 At stage 2, for Housing and Neighbourhoods, 33 complaints were partly upheld (52%) and 13 were upheld (20%), meaning 72% of complaints were upheld or partly upheld.

3.0.26 For Housing Management Property, 65 complaints were partly upheld (37%) and 90 were upheld (51%). This means 88% of complaints were upheld or partly upheld which is the same as the previous year.

3.0.27 For Estate Services, 5 complaints were partly upheld and 2 complaints were not upheld at stage 2. This provides an uphold rate of 71%.

3.0.28 Overall, 83% of stage 2 complaints were upheld or partly upheld. This is a 5% increase from the previous year.

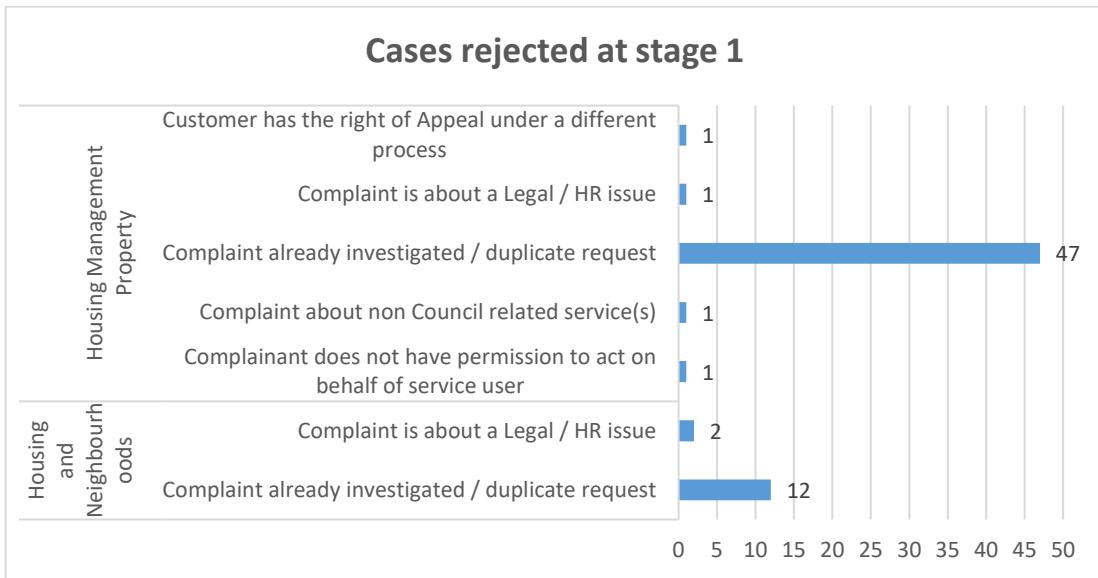
3.0.29 This again shows that there is a 19% increase in the complaints being upheld or partly upheld from stage 1 to stage 2 (same as last year). When looking at the stage 2 cases closed in 2024/2025 and comparing the stage 1 outcome with the stage 2 outcome, 21 complaints that were decided as not upheld were subsequently partly upheld or upheld at stage 2. This was broken down into 1 Estate Services complaint, 7 Housing and Neighbourhood complaints and 13 Housing Management Property complaints. This indicates that Housing

Management need to review the complaints more openly and accept where things have gone wrong and work to remedy the complaint to avoid escalation to stage 2.

3.0.30 The Complaints Service circulates all stage 2 responses to officers that were involved in the complaint investigation and the officer that responded at stage 1 so that stage 1 responses can be improved and lessons learnt.

3.0.31 Some service improvements identified at the final review stage have been included in point 14 - Learning from Complaints.

Complaints Rejected



3.0.32 At stage 1, 65 complaints were rejected which is more than the 47 that were rejected last year. As seen in the chart above, the main reason for this was that the complaint had already been investigated or there was a duplicate complaint request. Residents are required to email the Complaints Service to escalate their complaints to stage 2 of the Council's complaint procedure however some residents raise the same complaint on the complaints database. We therefore need to reject the complaint on the database and escalate the original complaint to avoid duplication. Some residents will also try to raise the same complaint again although their complaint has already been through the complaints procedure. In this scenario, they would need to escalate their complaint further by approaching the Housing Ombudsman to make a final decision on the complaint. This was the reason for 91% of complaints rejected and for 59 complaint rejections overall across the Housing Management Services.

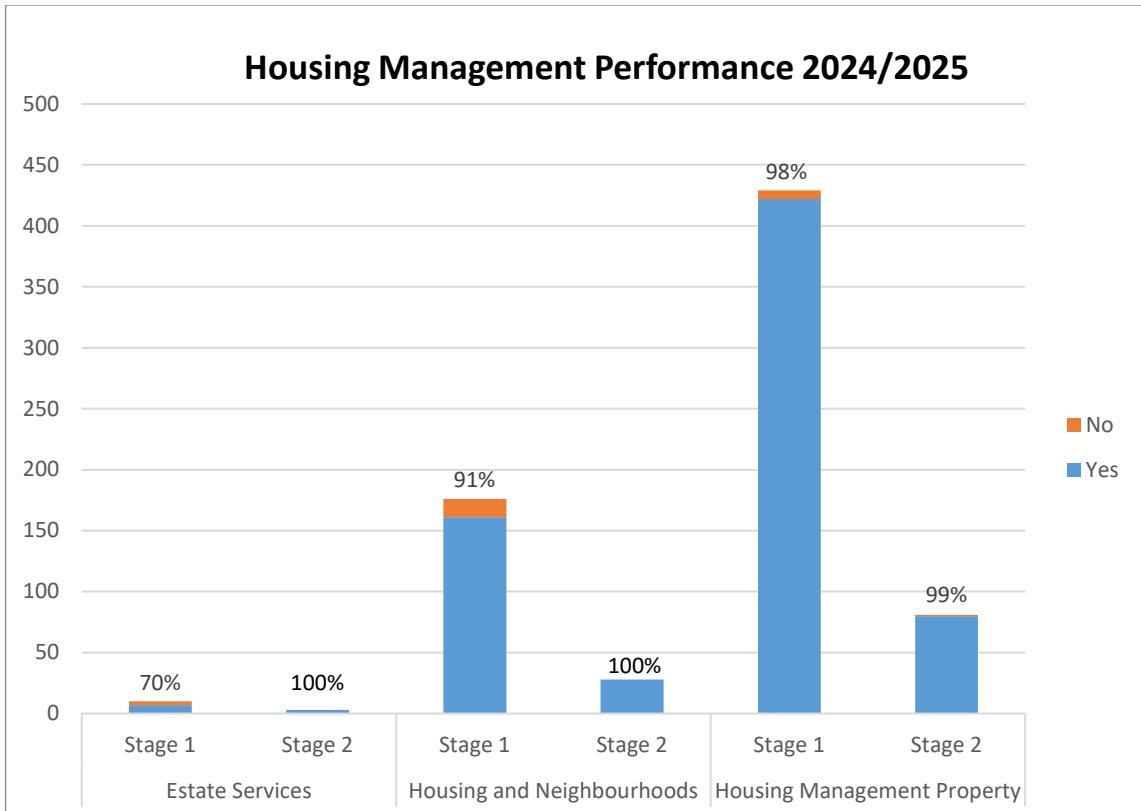
3.0.33 In addition, three complaints were rejected due to being about Legal or HR issues and therefore were investigated through different routes. Where the matter is already in Court, the Council is unable to investigate the complaint. Other reasons that cases were rejected included one complaint relating to non-Council related services, one complaint where the complainant did not have

consent to raise the complaint on behalf of the resident, and another complaint where there was a more appropriate avenue through an appeals process.

3.0.34 There was one escalation that was rejected as a response had already been provided under a separate complaint and therefore was a duplicate request.

Timeliness of Responses

3.0.35 The chart below shows complaint response times across the Housing Management Service in 2024/2025:



3.0.36 In 2024/2025, at stage 1, 98% of complaints from Housing Management Property were responded to on time, while 91% of Housing and Neighbourhoods complaints were responded to on time and 70% of Estate Services complaints were responded to within the expected timeframe. At stage 2, 99% of Housing Management Property complaints were responded to on time which is an increase of 3% compared with last year, and 100% of Housing and Neighbourhoods complaints and Estate Services complaints were responded to on time.

3.0.37 At stage 1, out of the 615 complaints due across the Housing Management Service, 590 were responded to on time. This means that 96% of all stage 1 complaints received a timely response. Of the 25 cases that were responded to outside of the relevant timescales, 10 were closed within two days of the deadline and 7 were closed within 1 day of the deadline. At stage 2, 99% of complaints were responded to on time, with this being the case for 111 of the 112 complaints due overall, so only one went outside of the required

timescales. This was a complex case which eventually was escalated to the Housing Ombudsman. The Ombudsman decided that the Council had satisfactorily resolved the resident's complaint and no further action was required.

Compensation

Stage	2023/2024		2024/2025	
	Total number of cases	Amount	Total number of cases	Amount
Stage 1	154	£41,865	260	£60,897
Stage 2	104	£54,159	93	£48,890
Total	258	£96,024	353	£109,787

3.0.38 The Council paid a total of £109,787, in compensation for Housing Management complaints in the year 2024/2025, comprising a total of 353 cases. At stage 1, compensation was awarded in 260 cases with a total of £60,897 compensation given overall. Stage 2 involved 93 cases, where £48,890 was awarded in compensation. The amount of compensation and cases that have been awarded compensation has increased which shows that are willing to compensate and remedy complaints at an early stage and thus preventing further compensation at stage 2 which can be seen by the decrease in amount of compensation and cases awarded compensation in 2024/2025.

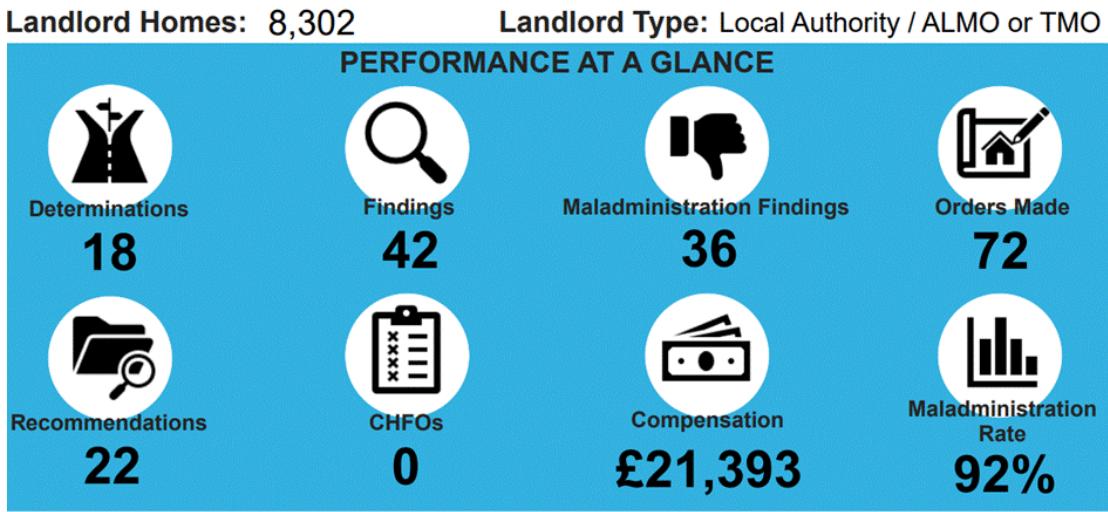
3.0.39 The main reason recorded for awarding compensation, was due to delay or failure to provide service. This accounted for 217 cases at stage 1 and 81 cases at stage 2. This is 84% of the cases where compensation was awarded across stage 1 and stage 2. The other three main reasons for compensation being paid were for time and trouble which was the reason compensation was given in 23 cases across stage 1 and 2, distress was the reason given for awarding compensation in 16 cases and costs that were incurred by customer was the reason compensation was paid in 11 cases. Another reason for awarding compensation included incorrect actions. When awarding compensation, we credit a resident's rent account if they are in arrears, make direct payments to their bank or, if the amount awarded is under £500, compensation is awarded as a postal voucher to be claimed at any post office.

3.0.40 Compensation awarded by the Council is benchmarked against the Housing Ombudsman's remedies guidance.

Housing Ombudsman Decisions in 2023/2024

3.0.41 The Housing Ombudsman has not yet provided its annual report for 2024/2025 and therefore we are unable to report on cases that have been referred to it for this financial year. The Housing Ombudsman has however asked that the comments from their 2023/2024 report are included in the Council's annual

report for 2024/2025. The table below has therefore been extracted from the Housing Ombudsman's 2023/2024 report on the Housing Management Service's performance. A copy of the Housing Ombudsman's performance report for Brent has been provided in Appendix 1.



3.0.42 The Housing Ombudsman decided eighteen Housing Management Service complaints in 2023/2024, with forty-two findings and thirty-six maladministration findings arising from these decisions. These resulted in seventy-two orders and twenty-two recommendations. There were no complaint handling failure orders (CHFOs) and no severe maladministration findings issued, both of which are positive outcomes.

3.0.43 A total of £21,393 compensation was recorded as having been ordered by the Housing Ombudsman during 2023/2024. Only £13,503 of this was additional compensation awarded by the Housing Ombudsman further to their investigations and decisions. £7,890 of the total compensation included in the total Housing Ombudsman figure of £21,393 had already been offered to complainants within the Council's complaints procedure.

3.0.44 The maladministration findings and orders are much higher than the previous year 2022/2023. This is mainly due to the number of determinations made compared to the previous year. In 2022/2023, the Housing Ombudsman made 8 determinations but in 2023/2024 there were more than double determinations made with 18 cases determined. In terms of the recommendations and orders, many of these had already been agreed during the Council's own complaints process and the Ombudsman had asked the Council to complete these if we hadn't done so already.

3.0.45 The maladministration rate has however increased by 19% compared to the previous year and therefore more work needs to be done to improve this. This seems to be an issue across local authorities as Brent performed similarly when compared to similar landlords by size and type.

3.0.46 The table below provides a breakdown of the findings by category for 2023/2024.

Complaint Decision	Severe Maladministration	Maladministration	Service failure	Mediation	Redress	No Maladministration	Outside Jurisdiction	Withdrawn	Total
Property Condition	0	15	2	0	1	0	2	0	20
Complaints Handling	0	5	5	0	0	0	0	0	10
Anti-social behaviour	0	2	1	0	1	0	0	0	4
Estate Management	0	3	0	0	0	0	0	0	3
Reimbursement and Payments	0	0	2	0	0	0	0	0	2
Health and Safety (inc. building safety)	0	1	0	0	0	0	0	0	1
Moving to a Property	0	0	0	0	0	0	1	0	1
Occupancy Rights	0	0	0	0	0	1	0	0	1
TOTAL	0	26	10	0	2	1	1	0	42

3.0.47 A list has been provided below of the sub categories:

- Responsive repairs – leaks / damp / mould
- Responsive repairs - general
- Noise
- Asbestos
- Pest Control (within property)

3.0.48 The Council complied with all 68 of the Housing Ombudsman's orders due to be closed in 2023/2024, achieving a 100% compliance rate.

3.0.49 The Council use the learning from complaints to inform decisions on areas of improvement within the Housing Management Service. The Council also carry out an annual self-assessment against the Housing Ombudsman's Complaint Handling Code to ensure compliance with the Code. A copy of the self-assessment has been provided in Appendix 2.

3.0.50 The Housing Ombudsman has released a series of reports in which they have put the spotlight on issues identified through complaints that they have investigated and resolved. These have consisted of the following:

- Damp and Mould spotlight report – this report contained a number of recommendations for landlords. The Council therefore self-assessed against these recommendations and provided a copy of the results in the annual report for 2022/2023.
- Knowledge and Information Management spotlight report - the Council have also undertaken a self-assessment against the Housing Ombudsman spotlight report on Knowledge and Information Management, and this assessment has been included in Appendix 3.
- Attitudes, Respect and Rights spotlight report – the Council self-assessed against this report last year and the results have been included in Appendix 4.

Benchmarking Data

3.0.51 Due to the short timescale set by the Housing Ombudsman for submitting the annual report, it was not possible to benchmark Brent's performance against other councils' annual reports. However, the Housing Ombudsman's 2023/2024 Annual Complaints Review provides comparative data for similar landlords.

3.0.52 According to the report, the average maladministration rate for London councils was 77%, while Brent's rate stood at 92%, indicating a need for improvement. However, when compared with landlords of similar size and type, Brent's performance was broadly in line, suggesting that many landlords are facing similar challenges in reducing maladministration findings.

3.0.53 Notably, Brent recorded no severe maladministration findings in 2023/2024, compared to a London average of 9% for local authorities. In addition, the Council did not receive any Complaint Handling Failure Orders (CHFOs) during the same period. These outcomes are positive indicators that, despite the higher maladministration rate, there were no serious failings that warranted severe findings or formal intervention.

Customer Feedback and Engagement

3.0.54 The Transparency, Influence and Accountability Standard set out by the Regulator of Social Housing requires all registered providers of social housing to collect and report annually on their performance using Tenant Satisfaction Measures. These are a set of defined measures that provide residents with more transparency regarding their landlord's performance. Through this, we can engage with tenants and glean further information around their housing concerns and satisfaction levels. To note, leaseholders are not part of the sample for these measures.

3.0.55 Complaints are all about listening to and acting on feedback. The proportion of tenant respondents who reported making a complaint in the last 12 months and who are recorded as satisfied with their landlord's approach to complaints handling is 22.2%. This is a slight increase on the previous year, which was at

17.4% and continues to illustrate that this is an area needing significant, evidence-led improvement. Another useful measure is the proportion of tenant respondents who are satisfied that their landlord listens to views and acts upon them. This year we achieved 39.2% satisfaction, compared to last year at 35.2%, another very slight increase. We will continue to engage with the wider resident base to understand what drives their perceptions of our service and what we can do to improve.

3.0.56 One way we are doing that is by creating a resident complaints group, to co-design the improvements highlighted by our complaints handling review. The review was driven by resident insight including Tenant Satisfaction Measure data, wider performance data, a complaint handling survey, benchmarking data, and a scrutiny exercise on the quality of responses. We are confident that by bringing residents together consistently to drive change and hold us to account that we will make effective, sustainable changes to how we deliver complaints.

3.0.57 Tenants were also asked how satisfied or dissatisfied they were with the overall repairs service from the landlord over the last 12 months and the proportion of tenants who reported that they were satisfied with the repairs service was 51.3%. This is a decrease of 3.8% from last year and continues to demonstrate how important it is that we use complaint insights to make targeted service improvements to better the resident experience.

Learning from Complaints and Service Improvements

3.0.58 Feedback from residents offers important insights into what we do well and what can be improved.

3.0.59 Learning from the lived experiences of residents can help identify where services, policies and procedures can be improved, and this helps to ensure that senior managers are informed of issues that matter to residents. This also helps to improve communication and strengthen relationships.

3.0.60 As a result of complaints received by Brent Council, many service improvements have been implemented. Some of the service improvements that have been implemented by the Housing Management Service as a result of complaints include:

- a) Property Services and Pest Control putting in place a more robust communication process to facilitate a coordinated approach in tackling issues of infestation, not least those of a historic nature.
- b) Plain English training has been made mandatory to improve accessibility of our communications with residents across our processes
- c) We have provided training for housing officers to better manage noise nuisance reports

- d) We have updated our adaptations process to improve resident experience.
- e) We have updated the CRM database with PFI properties (Hyde properties where we are the landlords) so that customer services could better triage calls and cases as previously tenants would be advised to go to Hyde even if we were their landlord.
- f) To develop a more robust written procedure for dealing with decants as well as for cases where tenants have declined the initial offer or offers of decant accommodation made to them.
- g) The Housing Management Service to carry out a review and implement a written policy on the use of dehumidifiers
- h) Review process for highlighting health and safety issues identified by surveyors to senior management
- i) Review of the training provided to surveyors
- j) Housing and Neighbourhoods service to review the wording of future anti-social behaviour letters to ensure they are proportionate to the circumstances.

3.0.61 We have implemented a new case review tool to help identify and monitor learning from complaints. Once this is embedded across the service, we will confidently be able to report on the progress of service improvements which are being led by the relevant service areas.

3.0.62 In October 2024, we launched a full review into our complaints handling. The review aims to create a holistic housing management complaints service which advocates for residents, puts things right, helps to rebuild trust, and that learns from its failings and improves to prevent failings happening again. The actions for improvement span from system improvements, internal guidance, training and campaigns, governance and performance monitoring – and makes crucial changes to the way the service is delivered to remove points of failure. This review is not about finding quick fixes or seeking an unjustified reduction in complaints, we want to set up an accessible and effective complaints process and a positive complaint culture embed across our services. Once we have full assurance that our complaint handling is robust, we can then focus on delivering measurable service improvements taken from our complaints learning.

3.0.63 Findings from the review, and learning from this years' complaint data, will be compiled in a Housing Management Complaint Handling Review report, which will be taken through the governance structures following the Corporate Complaints Annual Report.

3.0.64 Following the Council's annual Complaint Handling Code compliance submission on 28 June 2024, the Housing Ombudsman has reviewed the

Council's complaints policy. Their review focussed on ensuring landlords have met the requirements of the Code based on what residents can reasonably expect to be included in a policy document.

3.0.65 Their review identified twelve recommendations for the Council to consider. The Council has accepted all 12 recommendations and has updated its complaints policy to reflect the changes. A copy of the updated policy can be found in Appendix 5.

4.0 Stakeholder and ward member consultation and engagement

4.1 This report will be discussed at Cabinet and the relevant scrutiny committees.

5.0 Financial Considerations

5.1 The details provided on compensation payments in sections 3.0.38 - 3.0.40 and throughout this report reflect the monetary impact of not getting things right the first time as an organisation and the need to improve the customer experience thus minimising the financial penalties incurred by the Council.

5.2 The total compensation offered for Housing Management complaints during the Council's own complaint procedures in 2024/2025 was £109,787 (353 cases), which is an increase of 14% compared to the previous year. The costs implications and budgetary impacts to the Council are being continuously monitored.

6.0 Legal Considerations

6.1 Complaints concerning Housing Management fall under the Housing Ombudsman. The Ombudsman is the final stage in the complaints process, where an individual has complained to the Council and remains dissatisfied with the outcome.

6.2 The Complaint Handling Code became statutory on 1 April 2024, meaning that the Council is obliged by law to follow the requirements set out in the Code. The Social Housing (Regulation) Act 2023 places a duty on the Housing Ombudsman to monitor compliance with the statutory Complaint Handling Code. The Council's Complaints Policy was updated to take account of these changes.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

7.1 Under Section 149 of the Equality Act 2010, the Council has a duty when exercising their functions to have 'due regard' to the need:

- (a) to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited under the Act;
- (b) advance equality of opportunity; and
- (c) foster good relations between those who share a "protected characteristic" and those who do not.

- 7.2 This is the Public Sector Equality Duty (PSED). The 'protected characteristics' are: age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, sex, and sexual orientation.
- 7.3 Although there have been no equality implications identified as a result of this report, the Council is improving the way in which equalities data is captured and analysed so it can be used to identify issues that may disproportionately affect different equality groups.

8.0 Climate Change and Environmental Considerations

- 8.1 Not applicable

9.0 Human Resources/Property Considerations (if appropriate)

- 9.1 Not applicable

10.0 Communication Considerations

- 10.1 The Housing Ombudsman issues spotlight reports to address thematic issues and publishes a monthly report on cases of severe maladministration by landlords. Although the Council has not been featured in any of these reports, it is imperative that we learn from these reports to avoid severe maladministration decisions in the future.
- 10.2 The Council continues to advertise its complaints policy on the Council's website and in correspondence with residents. A copy of the Council's self-assessment against the Housing Ombudsman's complaint handling Code is also available on the Council's website along with a copy of this report once it has been through the relevant governance procedures. Comments from Cabinet in relation to the report will be included.

<u>Report sign off:</u>
<i>Minesh Patel</i>
Corporate Director of Finance and Resources

Housing
Ombudsman Service

LANDLORD PERFORMANCE REPORT

2023/2024

London Borough of Brent

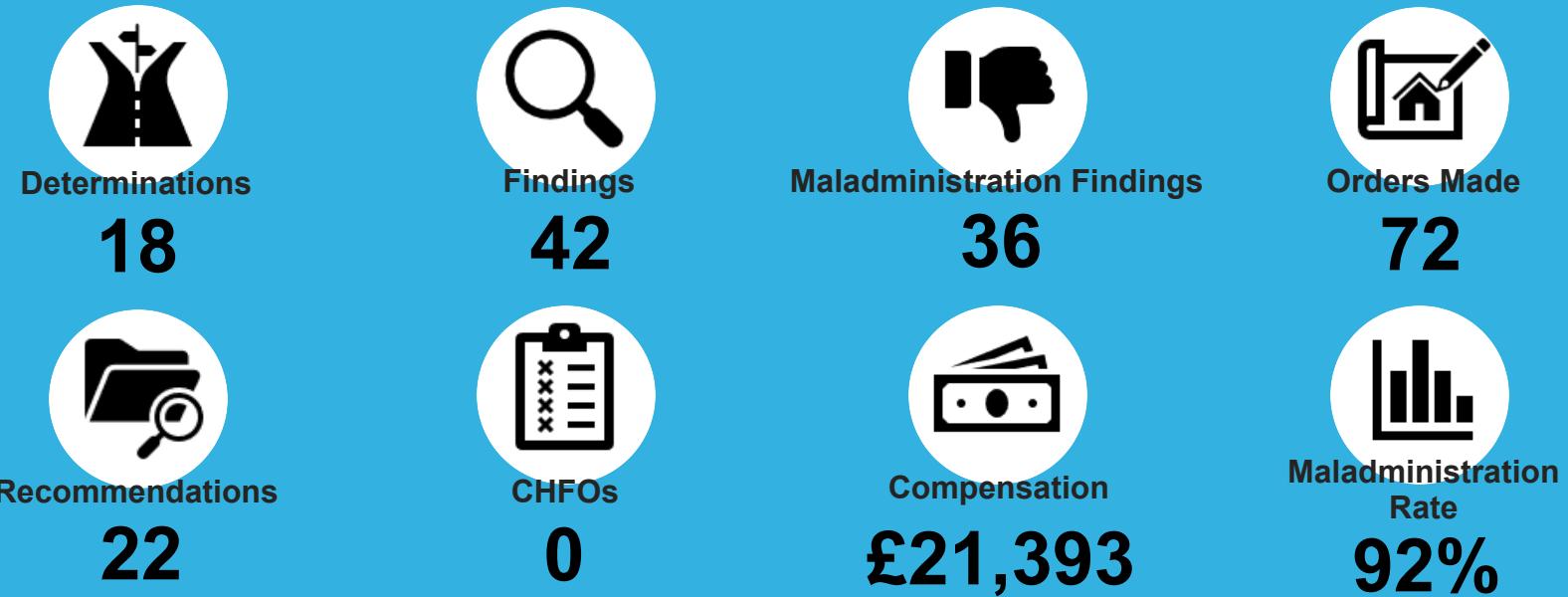
London Borough of Brent

Landlord: London Borough of Brent

Landlord Homes: 8,302

Landlord Type: Local Authority / ALMO or TMO

PERFORMANCE AT A GLANCE



PERFORMANCE 2022-2023



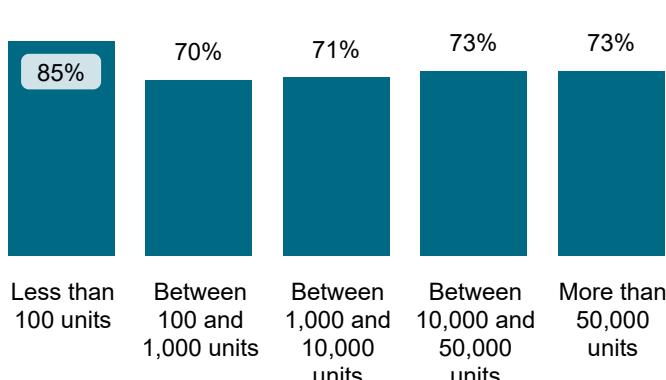
Maladministration Rate Comparison | Cases determined between April 2023 - March 2024

NATIONAL MALADMINISTRATION RATE: 73%

The landlord performed *similarly* when compared to similar landlords by size and type.

National Mal Rate by Landlord Size: Table 1.1

by Landlord Type: Table 1.2



Findings Comparison | Cases determined between April 2023 - March 2024

National Performance by Landlord Size: Table 2.1

Outcome	Less than 100 units	Between 100 and 1,000 units	Between 1,000 and 10,000 units	Between 10,000 and 50,000 units	More than 50,000 units	Total
Severe Maladministration	14%	6%	4%	8%	7%	7%
Maladministration	35%	37%	41%	42%	43%	42%
Service failure	18%	19%	20%	18%	19%	19%
Mediation	0%	0%	1%	1%	1%	1%
Redress	0%	5%	7%	8%	12%	9%
No maladministration	12%	21%	20%	15%	12%	15%
Outside Jurisdiction	22%	11%	8%	7%	5%	7%
Withdrawn	0%	0%	0%	0%	0%	0%

London Borough of Brent

Outcome	% Findings
Severe Maladministration	0%
Maladministration	62%
Service failure	24%
Mediation	0%
Redress	5%
No maladministration	2%
Outside Jurisdiction	7%
Withdrawn	0%

National Performance by Landlord Type: Table 2.2

Outcome	Housing Association	Local Authority / ALMO or TMO	Other	Total
Severe Maladministration	6%	9%	6%	7%
Maladministration	41%	45%	36%	42%
Service failure	19%	18%	21%	19%
Mediation	1%	1%	0%	1%
Redress	12%	4%	5%	9%
No maladministration	15%	15%	21%	15%
Outside Jurisdiction	6%	9%	11%	7%
Withdrawn	0%	0%	0%	0%

Outcome	% Findings
Severe Maladministration	0%
Maladministration	62%
Service failure	24%
Mediation	0%
Redress	5%
No maladministration	2%
Outside Jurisdiction	7%
Withdrawn	0%

Landlord Findings by Category | Cases determined between April 2023 - March 2024

Table 2.3

Category	Severe Maladministration	Maladministration	Service failure	Mediation	Redress	No maladministration	Outside Jurisdiction	Withdrawn	Total
Property Condition	0	15	2	0	1	0	2	0	20
Complaints Handling	0	5	5	0	0	0	0	0	10
Anti-Social Behaviour	0	2	1	0	1	0	0	0	4
Estate Management	0	3	0	0	0	0	0	0	3
Reimbursement and Payments	0	0	2	0	0	0	0	0	2
Health and Safety (inc. building safety)	0	1	0	0	0	0	0	0	1
Moving to a Property	0	0	0	0	0	0	1	0	1
Occupancy Rights	0	0	0	0	0	1	0	0	1
Total	0	26	10	0	2	1	3	0	42

Findings by Category Comparison | Cases determined between April 2023 - March 2024

Top Categories for London Borough of Brent

Table 3.1

Category	# Landlord Findings	% Landlord Maladministration	% National Maladministration
Property Condition	18	94%	73%
Complaints Handling	10	100%	84%
Anti-Social Behaviour	4	75%	68%

National Maladministration Rate by Landlord Size: Table 3.2

Category	Less than 100 units	Between 100 and 1,000 units	Between 1,000 and 10,000 units	Between 10,000 and 50,000 units	More than 50,000 units	% Landlord Maladministration
Anti-Social Behaviour	71%	61%	60%	67%	75%	75%
Complaints Handling	100%	87%	87%	86%	81%	100%
Property Condition	75%	63%	72%	74%	74%	94%

National Maladministration Rate by Landlord Type: Table 3.3

Category	Housing Association	Local Authority / ALMO or TMO	Other	% Landlord Maladministration
Anti-Social Behaviour	68%	69%	67%	75%
Complaints Handling	81%	91%	91%	100%
Property Condition	72%	77%	59%	94%

Findings by Sub-Category | Cases Determined between April 2023 - March 2024

Table 3.4

Highlighted Service Delivery Sub-Categories only:

Sub-Category	Severe Maladministration	Maladministration	Service failure	Mediation	Redress	No maladministration	Outside Jurisdiction	Withdrawn	Total
Responsive repairs – leaks / damp / mould	0	8	0	0	1	0	0	0	9
Responsive repairs - general	0	5	1	0	0	0	0	0	6
Noise	0	1	0	0	1	0	0	0	2
Asbestos	0	1	0	0	0	0	0	0	1
Pest control (within property)	0	1	0	0	0	0	0	0	1
Total	0	16	1	0	2	0	0	0	19

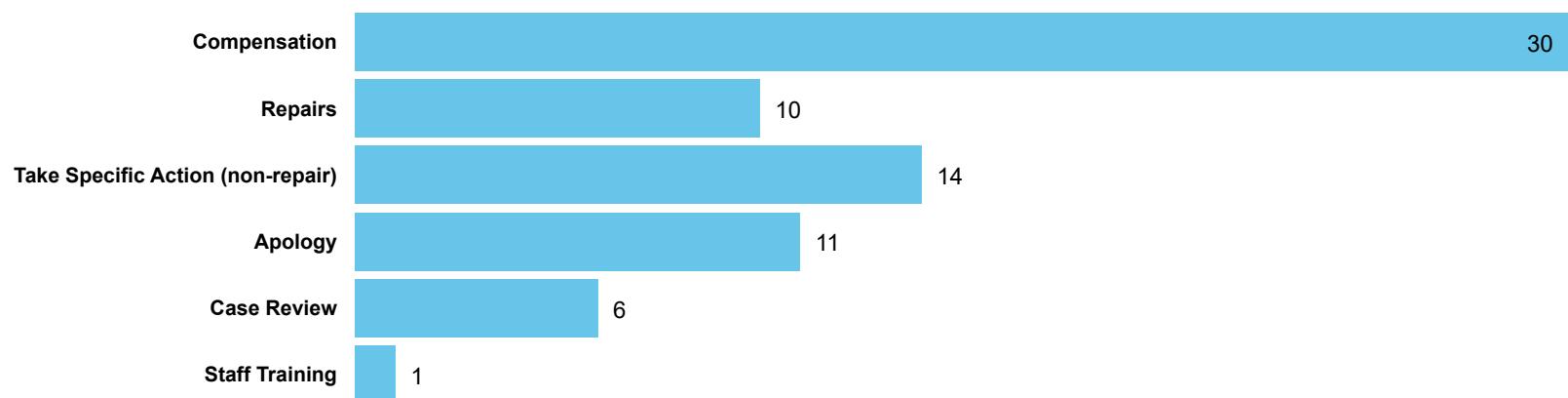
Top Sub-Categories | Cases determined between April 2023 - March 2024

Table 3.5



Orders Made by Type | Orders on cases determined between April 2023 - March 2024

Table 4.1



Order Compliance | Order target dates between April 2023 - March 2024

Table 4.2

Order	Within 3 Months	
Complete?	Count	%
Complied	68	100%
Total	68	100%

Compensation Ordered | Cases Determined between April 2023 - March 2024

Table 5.1

● Ordered ● Recommended



Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

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	Complaints Policy (Under point 3.1)	The definition in the Complaints Policy reads: "A complaint is defined as an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual or several individuals." The reference to residents has been removed as anyone can make a complaint, not just residents.
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 a complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Complaints Policy (Under point 3.1 & 3.2)	Residents do not have to use the word complaint for it to be treated as one and a complaint submitted via a third party or representative is handled in line with the Council's complaints policy. As per the policy and definition above, a complaint could be made about the following: <ul style="list-style-type: none"> • Delay in taking action without good reason • Failure to provide a service • Mistakes in the way a decision was taken • Not following the law or the Council's own rules • Broken promises • Giving incorrect or misleading

				<p>information</p> <ul style="list-style-type: none"> • Bias or discrimination • Rude, unhelpful or inappropriate behaviour by staff • Poor communication <p>Complaint training provided to staff also reiterates that residents do not have to use the word 'complaint' for it to be treated as such.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Workshops, training and guidance to improve our tolerance of dissatisfaction, and how we are identifying and recording potential complaints. • An internal campaign, using case studies, to improve identification of dissatisfaction due to potential service failings and strengthen root cause analysis.
1.4	<p>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</p>	Yes	<p><u>Complaints Policy</u> (Under point 3.1)</p>	<p>The Council recognises the difference between a complaint and a service request. It mentions in its Complaints Policy, "Some issues do not fall within the category of a complaint and are more appropriately dealt with as a service request. This can include instances where a customer is 'complaining' about a</p>

	<p>complaints, but must be recorded, monitored and reviewed regularly.</p>			<p>problem that the Council has not created, such as neighbour noise nuisance. The same can be true for a 'complaint' received to report a repair request. These are requests to the Council for appropriate action to be taken."</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Workshops, training and guidance to improve our triaging of dissatisfaction and recording of potential complaints. • An internal campaign, using case studies, to stop the reliance on service requests. • Monitoring of service requests will be added to all casework conversations and used to improve our customer access. First analysis to be published in our Housing Management Complaints Performance Review later this year.
1.5	<p>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.</p>	Yes	<p><u>Complaints Policy</u> (Under point 3.1)</p>	<p>The Council will log a complaint where the complainant is not happy with the way in which their service request/s has/have been handled. The Council will continue to take action on the requests raised whilst the complaint is being investigated.</p>

1.6	<p>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.</p>	Yes	<p>Awareness of complaints process in tenant satisfaction surveys</p>	<p>The Council will outline where appropriate, how a resident can raise a complaint should they express dissatisfaction through a survey or any other feedback mechanism. We will include in our tenant satisfaction surveys information on how residents can pursue any dissatisfaction with the service they have received through the complaints process.</p>
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Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	<p>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</p>	Yes	<p><u>Complaints Policy</u> (Under point 8.1)</p>	<p>The Council accepts all complaints unless there is a valid reason not to, including where it falls within Appendix 1 of the Complaints Policy.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Reinforce in training and guidance • To be added as an assessment point on the complaints audit programme

2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • 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	<p><u>Complaints Policy</u> (Under point 3.4)</p>	<p>The Complaints Policy clearly outlines what can and cannot be considered under the Council's complaints process. The circumstances are fair and reasonable and in line with Housing Ombudsman guidance.</p>
2.3	<p>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.</p>	Yes	<p><u>Complaints Policy</u> (Under point 3.4)</p>	<p>The Council accepts complaints that are made within 12 months of the issue occurring or the complainant becoming aware of the issue unless they are excluded on other grounds. There may be occasions where the Council will apply discretion to investigate complaints which exceed the 12 months period. The Complaints Policy states: "The Council will accept complaints made within 12 months of the issue occurring or the individual being made aware of the issue, unless</p>

				<p>excluded on other grounds such as the ones outlined in section 8.1 of this policy. The Council will not normally accept a complaint where the customer has delayed raising the complaint with the Council by more than 12 months.</p> <p>The Council recommends that contact is made as soon as possible, to ensure access to data is readily available. Complaints exceeding 12 months will be considered on a case by case basis."</p>
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	<p><u>Complaints Policy</u> (Under point 3.4)</p>	<p>If a complaint is not to be considered, the resident will still receive a response detailing reasons why the complaint cannot be considered and the response will include escalation rights.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Reinforce in training and guidance • To be added as an assessment point on the complaints audit programme
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<p><u>Complaints Policy</u> (Under point 3.4)</p>	The Council will consider complaints exceeding 12 months on a case by case basis. This is noted in the Complaints Policy. We also have a Vexatious Complaints Policy which we follow but this again will consider individual circumstances of the case.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	<p>Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint.</p> <p>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.</p>	Yes	<p><u>Complaints Policy</u> (Under point 3.3)</p>	<p>Complaints can be raised via email, in person, by telephone or using the online form or portal. They can also be submitted via a Councillor or directly to officers if the resident asks for an issue to be processed through the complaints process. We accept all forms of communication including verbal, written or online.</p> <p>The Council is committed to ensuring that all residents can access its services and are not disadvantaged in any way. Below are some of the adjustments that can be offered which are outlined in the Council's Complaints Policy:</p> <ul style="list-style-type: none"> • use of email or telephone in preference to hard copy letters • use of plain English or Easy Read service on our website • communication through a representative or intermediary • rest or comfort breaks in meetings. • provision of information in appropriate alternative formats (eg. large print, Braille, coloured paper etc.) • provision of auxiliary aids

			<p>The Equality Act 2010 introduced the Public Sector Equality Duty (PSED) which the Council considers when carrying out day-to-day functions, crafting policies and delivering services. All staff undertake equality and diversity training, which is part of the Council's essential training programme. The Council's Equalities Strategy Lead officer is currently undertaking an overarching piece of work which is reviewing accessibility to the Council – not just in terms of physical access but also looking at how residents and customers are able to interact with us and access services/support based on, for example, our use of language in corporate materials. Our Equalities Strategy, due for circulation next year alongside our Borough Plan, will set out a detailed approach on how we aim to remove inequalities and build a better, stronger, more inclusive Brent.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none">• Plans to consult and co-design improvements with the resident complaints group• Complaints campaign during resident summer roadshows 'how to make a
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				<p>complaint'</p> <ul style="list-style-type: none"> • Improved website content • Improving internal guidance on routes to complaint and support that may be required by residents
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	Complaints are accepted in person, on the phone, via email and social media channels	<p>Officers within the Council are made aware of the complaints process. Services know how to log their own complaints and there is a corporate team within the Council to offer assistance and provide training. The Housing Department have a dedicated team who log all housing complaints.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • New Housing Complaints Guidance • Housing Services Complaint Handlers Teams area • Potential development of a staff form to support residents to make their complaint
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	We provide this narrative in our Annual Complaints Report	<p>The Council welcomes complaints as a way of learning and agrees that the number of complaints is not indicative of a high number of issues within the borough, it can demonstrate awareness of the complaints process.</p> <p><u>Recommendations following Complaint Learning Review:</u></p>

				<ul style="list-style-type: none"> • Directly addressing this message as part of the project which is championing different metric e.g. reducing number of escalated and upheld complaints, as opposed to lowering volumes • Realigning data and performance information with resident outcomes • Extensive ongoing data validation and system changes to ensure complaint volumes are accurate • Complaints campaign during resident summer roadshows 'how to make a complaint' • Development of a complaints comms plan
3.4	<p>Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.</p>	Yes	<p><u>Complaints Policy</u> (Under point 7.1)</p> <p><u>How to make a complaint </u> <u>Brent Council</u></p>	<p>Our complaint policy is available on the Council's website in a clear and accessible format for all residents. The policy is available with voiceover, and can be translated from the toolbar in a number of languages, viewed using screen mask or with enlarged text. The policy explains the complaint stages, what will happen at each stage, and timeframes for a response. The policy also explains "The Council will consider and try to accommodate as far as possible any requests to provide the policy and any other relevant documents in an accessible format."</p>

				<p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • housing specific complaint webpage to make it clearer for our residents, with simplified information and tested for reading age • Potential to explore other mechanisms e.g. infographics, video etc, to be co-designed with the resident complaints group
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	<p><u>Complaints Policy</u> (Under point 7)</p>	<p>The Complaints Policy explains how we publicise details of the policy, contains information on the Housing Ombudsman and the Code. A copy of the Council's self-assessment of the code and the Code itself are all publicised on the Council's complaints webpages. Our final review complaint responses also signpost residents to the Housing Ombudsman should they remain dissatisfied. The Housing Management Service will include in regular correspondence (leaflets, posters, newsletters) details of the Housing Ombudsman and Complaints Handling Code as well as the Complaints Policy.</p> <p>The Housing Management Service will also be providing information on notice boards within Council blocks, at Resident Associations and will insert an advert banner on all their emails to residents for</p>

				short periods across the year promoting the complaints process.
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	<u>Complaints Policy</u> (Under point 3.2)	The Council accept complaints from advocates, a representative or family member as long as consent from the complainant has been provided. Where reasonable they are also able to attend any meetings.
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	<u>Complaints Policy</u> (Under point 3.7)	<p>Contact details for the Housing Ombudsman are available on the Council's webpages and a direct link to the Ombudsman website is also provided. The Complaints Policy details a complainant's right to access the Housing Ombudsman Service throughout their complaint. Our final review complaint responses also signpost residents to the Housing Ombudsman should they remain dissatisfied.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • The resident newsletter introduced in 2025 to include regular messaging around complaints and the Housing Ombudsman • Complaints campaign 'how to make a complaint' • Review of tenancy sign up information is ongoing and checking complaints

				information will feature as part of this review
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Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	<p>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.</p>	Yes	<p>We have a Corporate Complaints team who report to the governing body.</p>	<p>The Housing Management Service have a dedicated support team and a Complaints Officer managing complaints. In addition, our principal repairs contractor has a dedicated complaints officer and we have weekly complaints meetings to address lessons learnt from complaints and work on next steps. The Council also have a corporate complaints team that monitor and track all complaints received by the Council. The corporate complaints team compile complaint reports to Cabinet on a yearly basis.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Creation of a new Teams are for all Housing Services Complaint Handlers' i.e. anyone who is involved in our residents' complaints • Ongoing review of how complaints are monitored and coordinated across

				Housing Services and beyond to the other teams and contractors who provide landlord services
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	The Corporate Complaints team interact with staff at all levels and have the authority and autonomy to resolve complaints. The team also hold a compensation budget for stage 2 complaints	All complaint handlers receive training on dealing with complaints and complainants. They have autonomy to resolve complaints and approve lower level compensation payments. There is also direct access to senior staff to facilitate quick resolution and approve higher level payments or complex remedies.
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	Complaint Handling training is provided to officers	<p>All relevant staff are suitably trained to handle complaints. Services are reasonable resourced to handle complaints and we have a corporate complaints team which is a core service that delivers refresher training sessions for staff across the Council.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • New Ombudsman Review tool to be implemented- review learning from positive feedback received • Further mandatory training for all complaint handlers and monitoring of attendance to be introduced • Creation of a new Teams group for all Housing Services Complaint Handlers' i.e. anyone who is involved in our residents' complaints to keep reaffirming

				key messages
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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	Complaints Policy	<p>The Council has one single Policy for dealing with complaints which details all the necessary information in regards to the management of complaints. All complainants are treated fairly and in line with the policy. They are not treated adversely if they complain.</p> <p>Recommendations following Complaint Learning Review:</p> <ul style="list-style-type: none"> • Introduction of new Housing Complaints guidance document to clarify specific information for staff and residents
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	Complaints Policy (Under point 3.5)	The Council has one single complaints process which has two stages. The policy outlines how complaints will be dealt with.
5.3	A process with more than two stages is not acceptable under any	Yes	Complaints Policy	The Council operates a two stage complaint process.

	circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.			
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	We have agreements in place with contractors in relation to complaints handling	<p>We ask any third parties to whom we have delegated complaint handling to respond at stage 1 of the process and if the complainant remains dissatisfied they have a right to escalate to stage 2 in which the Council will investigate and respond.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Full mapping exercise to clarify where responsibilities sit with third parties and strengthen our monitoring of this
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	This is included in our third party agreements	<p>We provide third parties with the process which they must follow and ask that they handle complaints in line with the Code. We also hold regular meetings with our contractors to discuss volumes and complaints handling.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Full mapping exercise to clarify where responsibilities sit with third parties and strengthen our monitoring of this
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2,	Yes	Complaints Policy	Complaint acknowledgements include a brief summary of the area of complaint and

	<p>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.</p>		<p>(Under point 3.5)</p> <p>Complaint acknowledgements have been updated to reflect this</p>	<p>officers dealing with the complaint will promptly contact the complainant to request clarification if any aspect of their complaint is unclear or should the outcome the resident is seeking also not be clear. This has been explained in the policy “complaints are logged, defined and acknowledged within 5 working days of the complaint being received. The acknowledgement will include our understanding of the complaint, the outcomes that are being sought, which aspects the Council is or isn’t responsible for and if there are any aspects that are unclear clarification will be sought.”</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Reinforced through training and guidance • To be added as an assessment point on the complaints audit programme • Closer monitoring on those that receive a second auto acknowledgement to be implemented to prevent non-compliance
5.7	<p>When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not,</p>	Yes	<p><u>Complaints Policy</u></p> <p>(Under point 3.5)</p>	<p>Complaint acknowledgements make clear what aspects of the complaint are to be investigated and confirm any aspects that fall outside of the policy or aspects for which we are not responsible.</p>

	<p>responsible for and clarify any areas where this is not clear.</p>		<p>Complaint acknowledgements have been updated to reflect this</p>	<p>This has been explained in the policy “complaints are logged, defined and acknowledged within 5 working days of the complaint being received. The acknowledgement will include our understanding of the complaint, the outcomes that are being sought, which aspects the Council is or isn’t responsible for and if there are any aspects that are unclear clarification will be sought.”</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Reinforced through training and guidance • To be added as an assessment point on the complaints audit programme
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> deal with complaints on their merits, act independently, and have an open mind; give the resident a fair chance to set out their position; take measures to address any actual or perceived conflict of interest; and consider all relevant information and evidence carefully. 	Yes	<p><u>Complaints Policy</u> (Under point 3.5)</p>	<p>All complaint handlers receive relevant training on complaints handling to conform to the points listed. There is also guidance on the Council’s intranet pages to reinforce these points to officers. Annual Data Protection training is also a mandatory training requirement for all officers. If a complaint concerns a particular individual it is assigned to their line manager. The Corporate Complaints team investigate stage 2 complaints independently of the service about which a complaint has been made.</p>

				<p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Reinforced through training and guidance • To be added as an assessment point on the complaints audit programme
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	<p><u>Complaints Policy</u> (Under point 3.6)</p>	<p>Where reasonable, officers will keep residents updated with the progress of their investigation. Complainants are informed in advance on the rare occasions when there will be a delay in responding and will agree on regular updates until a full response is provided.</p> <p>The policy states “On occasions where additional time is required beyond the extended timescales noted above (more than 20 days from stage 1 acknowledgement or more than 40 days of the complaint being acknowledged at stage 2) the investigator will agree with the complainant suitable intervals for being updated on their complaint.”</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Working on system solutions to improve

				<p>the way we control and monitor case extensions to ensure this process is followed</p> <ul style="list-style-type: none"> • To be added as an assessment point on the complaints audit programme
5.10	<p>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.</p>	Yes	<p><u>Complaints Policy</u> (Under point 3.2)</p>	<p>The Council makes reasonable adjustments for residents where appropriate. The Complaints Policy provides examples of some of the reasonable adjustments that can be made. Residents can indicate when raising a complaint whether they have any disabilities or require any adjustments. This information is then recorded on their complaint record.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Formalise adjustments when reviewing the complaint customer journey • Enhance data collection and usage as part of wider, longer-term projects on resident data • Share good case studies through training and Teams area
5.11	<p>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</p>	Yes	<p><u>Complaints Policy</u> (Under point 3.5)</p>	<p>The Council does not refuse to escalate a complaint through its complaints procedure unless there is a valid reason. Reasons why a complaint may not be escalated are stipulated in the Council's Complaints</p>

	reasons, and they must comply with the provisions set out in section 2 of this Code.			Policy. A response will be provided to the resident outlining why we will not escalate the complaint.
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	This is all contained within the Council's case management system and can be downloaded	<p>All records of the complaint are logged on the Council's case management system. This includes dates of complaint receipt and responses, relevant correspondence and documentation, and details of any compensation and corrective actions/service improvements and outcomes. Corrective actions and service improvements are separately monitored by the service to ensure actions are carried out. We also record issue types and root causes of complaints.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • System and process requirements to be backed up in Housing Complaints guidance • To be added as an assessment point on the complaints audit programme
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	Yes	Officers handling complaints have the autonomy to suggest and implement appropriate remedies at any stage of the complaints process	We do our best to resolve a complaint at the first point of contact. We consider the issues and after full consideration will propose a reasonable solution. Any immediate actions will be taken as soon as possible.

	complaints process without the need for escalation.			<u>Recommendations following Complaint Learning Review:</u> <ul style="list-style-type: none"> • Potential to implement a compensation/remedies policy or guidance for housing complaints • To be picked up through training
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	Vexatious Complaints Policy 2023	The Council's Vexatious Complaints Policy provides procedures on how to manage unacceptable behaviour from residents and/or their representatives when pursuing a complaint. When a person is restricted we keep all evidence in a folder and a reason for restriction is provided in our restriction letter. We have a review period for restrictions. The Council are working on a Council-wide unreasonable behaviour policy
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	Vexatious Complaints Policy	Restrictions placed following unacceptable complainant behaviour and managed through the Vexatious Complaints Policy consider the Equality Act 2010 and impact on individual complainants. Only necessary restrictions are applied relating to specific issues. We always allow residents in these circumstances to access Council services more generally. We also have review periods for restrictions. The Council are working on a Council-wide unreasonable behaviour policy.

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	<u>Complaints Policy</u> (Under point 3.5)	<p>The Council will aim to respond to complaints as early as possible and specifically where there are any risks or vulnerabilities involved and the issue is current/live as well as if the complaint raises something urgent, like an outstanding repair, we will seek to progress that as soon as possible, at the same time as pursuing a complaint investigation. Where the complaint relates to historic issues or is complex these may take longer to investigate.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Ongoing discussions about how records and information is shared between housing systems to enable • Once stronger record keeping is in place then guidance and training will reinforce a more formalised process
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five</u>	Yes	<u>Complaints Policy</u> (Under point 3.5)	The Council logs and acknowledges all stage 1 complaints within 5 working days. This is also stipulated in our Complaints Policy.

	<u>working days of the complaint being received.</u>			<u>Recommendations following Complaint Learning Review:</u> <ul style="list-style-type: none"> • New channels for reporting complaints and triaging straight to housing complaints team are being explored and implemented • Reporting around acknowledgements to be enhanced to allow for stronger case management and assurance that tailored information is sent • To be added as an assessment point on the complaints audit programme
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Complaints Policy (Under point 3.6)	The Council responds to complaints within 10 working days of the complaint being acknowledged.
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	Complaints Policy (Under point 3.6)	Where the Council requires more time to investigate the issues and provide a response, an email is sent to the resident explaining the reason for the extension and providing a new deadline date which does not exceed 10 working days. <u>Recommendations following Complaint Learning Review:</u> <ul style="list-style-type: none"> • System changes being explored to add more controls to this part of the process and strengthen accurate compliance

				<p>report</p> <ul style="list-style-type: none"> • Reinforced in training and guidance • To be added as an assessment point on the complaints audit programme
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	Email acknowledgements have been updated to reflect this.	<p>When we request for an extension of the timescales in our email to the complainant we will include details of the Ombudsman.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Reinforced in training and guidance • To be added as an assessment point on the complaints audit programme
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	<p><u>Complaints Policy</u> (Under 3.7)</p>	<p>A complaint response is provided once an investigation has been completed and no later than the maximum timescale outlined in the Complaints Policy. Any actions required following the investigation will be logged with a timescale and tracked until completion on the Council's complaints system. This is explained in the policy "Complaints will normally be closed once an investigation has been completed and a response has been provided to the complainant. If there are any outstanding actions following a complaint response at any stage, these are logged on to the Council's complaint system with an agreed timescale and tracked to completion. Updates on these outstanding actions will be provided to the complainant."</p>

6.7	<p>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.</p>	Yes	<p>The Council has a template letter which officers need to follow when responding to complaints to ensure a thorough response is provided</p>	<p>The Council addresses all points raised in the complaint, clearly providing reasons for decisions, and referencing any relevant law/good practice.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Reinforced in training and guidance • To be added as an assessment point on the complaints audit programme
6.8	<p>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.</p>	Yes	<p><u>Complaints Policy</u> (Under point 3.6)</p>	<p>Where additional complaints are raised during the investigation, these will be incorporated if relevant and if the response has not yet been issued. If the issues require significant time to be looked into and would delay the response, a new complaint will be logged, or new timescale will be agreed with both parties. This is stipulated in the policy "If additional related information or complaints are provided during the course of the investigation, the Council will incorporate them into the stage 1 response if the response has not yet been issued, however we may need to extend the response time to consider the new information. It is therefore important that all supporting information is provided at the time the complaint is lodged. Any new issues will be logged as a new complaint if the stage 1 has already been</p>

				<p>issued, the issues are unrelated, or it would unreasonably delay the response.”</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Reinforced in training and guidance • To be added as an assessment point on the complaints audit programme
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ol style="list-style-type: none"> the complaint stage; the complaint definition; the decision on the complaint; the reasons for any decisions made; the details of any remedy offered to put things right; details of any outstanding actions; and details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	<p>The Council has a template letter which officers need to follow when responding to complaints to ensure all points are covered.</p>	<p>The Council has a template available for officers to use so that all the points (a-g) are addressed within the response.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Reinforced in training and guidance • To be added as an assessment point on the complaints audit programme

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	<p><u>Complaints Policy</u> (Under point 3.5)</p> <p>We have a two stage process, and escalation details are provided in all stage 1 responses.</p>	<p>All stage 1 complaints inform complainants that if they remain dissatisfied, they can escalate their complaint to stage 2 and details are provided of how they can do this. This is also explained in the policy at section 3.5 "the complaint can be progressed directly to stage 2, if all or part of the complaint is not resolved to the complainant's satisfaction. Details of how complainants can escalate their complaints to stage 2 will be contained in the stage 1 response."</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Reinforced in training and guidance • To be added as an assessment point on the complaints audit programme
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	<p>All stage 2 complaints are acknowledged, defined and logged within 5 working days as per the Complaints Policy</p>	<p>All stage 2 complaints are defined and acknowledged within 5 working days of receipt. This is explained in the policy.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • To be added as an assessment point on

				the complaints audit programme
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	Officers make reasonable enquiries to determine what points are outstanding.	<p>The Council will make reasonable efforts to understand why complainants remain unhappy, however, if it is not clear we will ask the complainant for clarification so that we can ensure we address all the issues they remain unhappy with and avoid any misunderstanding. The policy explains that “although not a requirement we ask that they clearly state what parts of their complaint have not been addressed satisfactorily and the reasons why so that the investigator can focus the investigation and identify the aspects of the stage 1 that did not sufficiently remedy the complaint and for any outstanding points to be addressed in the stage 2 response.”</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • To be added as an assessment point on the complaints audit programme
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<u>Complaints Policy</u> (Under point 3.5)	All stage 2 responses are investigated by the Corporate Complaints team who are independent of the service area and officer who has responded at stage 1. Corporate directors review and decide stage 2 complaints. If they are unavailable, this is delegated to a director to approve and sign off.

6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Complaints Policy (Under point 3.6)	The Council aims to respond to all stage 2 complaints within 20 working days of acknowledgement, where possible.
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	Complaints Policy (Under point 3.6)	When considering a complaint escalation that has been received and it is clear that due to complexity or other factors that more time will be required to investigate we will inform the complainant in the acknowledgment or a further email of the new expected timescale which will not exceed an additional 20 working days.
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	Complaint acknowledgements have been updated to cover this	We provide details of the Ombudsman when we require an extension of the response timescales. Recommendations following Complaint Learning Review: <ul style="list-style-type: none">• To be added as an assessment point on the complaints audit programme
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	Yes	Complaints Policy (Under point 3.7)	A complaint response is provided once an investigation has been completed and no later than the maximum timescale outlined in the Complaints Policy. Any actions required following the investigation will be logged with a timescale and tracked until

	must still be tracked and actioned promptly with appropriate updates provided to the resident.			completion on the Council's complaints system. This is explained in the policy.
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	The Council has a template letter which officers need to follow when responding to complaints to ensure a thorough response is provided	The Council addresses all points raised in the complaint, clearly providing reasons for decisions, and referencing any relevant law/good practice.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	The Council has a template letter which officers need to follow when responding to complaints to ensure all points are covered.	At the completion of a stage 2 investigation, a response is issued which includes the points stated. The response includes a summary of the complaint, a chronology of any relevant events, the decision and reasons for it. It also includes any actions and learning with timescales for implementation and a reasonable remedy which may include compensation.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	<u>Complaints Policy</u> (Under point 6.1)	All relevant officers are consulted before a second stage complaint response is finalised, to ensure that the decision is a corporate one.

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"> • 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	<p>In complaint responses if we are in the wrong we will apologise, explain what happened and provide information on what actions will be taken to remedy the issue whether that be a change in policy or procedure, sending a reminder to staff, taking specific action or providing a financial remedy. All actions are documented on the Council's complaints system and assigned to an officer to action.</p>	<p>The Council will always try to resolve the issues as soon as possible. If the Council is at fault, it will accept fault, offer an apology, and provide a plan of action to put things right if the issues have not yet been resolved.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Reinforced through training and guidance using best practice e.g. HO apologies guidance • Key message to be enforced as part of cultural change towards a positive complaints culture • To be added as an assessment point on the complaints audit programme
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p><u>Complaints Policy</u> (Under point 4.1)</p>	The Council follows the remedies guidance provided by the Housing Ombudsman. All remedies are considered on their own merit and in line with published guidelines.

				<p>The Council will try its best to manage expectations of what remedies can and cannot be delivered.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Potential to implement a compensation/remedies policy or guidance for Housing complaints • To be picked up through training
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	Remedies are logged on the Complaint system and assigned to an officer with a timescale for completion	<p>Any actions to be taken to remedy fault will be explained and clear timescales will be provided. Corrective actions will be monitored and tracked to completion.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Bringing together all responsibilities in one process end-to-end of the complaints journey • Monitoring of corrective actions as commitments • Remedies and compensation guidance review
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.		<u>Complaints Policy</u> (Under point 4.1)	The Council follows the Housing Ombudsman guidance on compensation and considers payments that are required by law, any refunds/reimbursement of

				losses, time and trouble, distress and inconvenience.
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Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> 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 	Yes	<p>Open data link to annual reports: Annual Report Data</p>	<p>The Council produces an annual report which includes our self-assessment of the Code, quantitative and qualitative data on performance and the types of complaints received, any findings of non-compliance with the Code, any annual report about the landlord's performance from the Ombudsman, and any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p> <p>The report is then reviewed through the Council's governance procedures which includes Cabinet and relevant scrutiny committees.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Housing Services Quality Assurance and Standards Team jointly working on self-assessment against the Code with the corporate complaints team to improve on the detail included,

	<p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>			<p>transparency and accountability of the service</p> <ul style="list-style-type: none"> • Improving data analysis to feed into the report – to include qualitative analysis • QA Team to produce a performance report later in the year which triangulates the findings from this self-assessment, with performance and insight, and findings from the review
8.2	<p>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.</p>	Yes	<p>Copy of latest published annual report on relevant website page: Latest Annual Report</p> <p>Cabinet response to report: Cabinet Report and Governing Body's Comments</p>	<p>The annual complaints report is reported to the Council's governing body and to the relevant scrutiny committees. The annual complaints report is also published on the Council's website on the Complaints page. The governing body's response to the report can be found in the Cabinet report minutes under the relevant governance page along with a copy of the report. The report for this year is awaiting to go through the relevant governance procedures before it is published.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Reporting to the newly formed Housing Management Advisory Board • Reporting more consistently to the MRC • Clearer governing body response on the website

8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	This is our latest self-assessment and is to be included as an appendix in our annual report 2024/2025	<p>The Council will carry out a self-assessment if there have been significant changes. The outcome of the self-assessment is reported to elected members. It is also published on the Council's website and included in the annual complaints report.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Housing Services Quality Assurance and Standards Team jointly working on self-assessment against the Code to ensure it reflects ongoing changes as the project progresses
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We self-assess against the Code on an annual basis and when asked by the Ombudsman.	Noted. The Council has not been asked to do this.
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	We will alert the Ombudsman and resident if we are unable to comply with the Code due to exceptional reasons.	The Council will inform the Ombudsman if due to exceptional circumstances we are unable to comply with the requirements of the Code. We will advise complainants who may be affected and we will publish on our website a timescale of when we will be returning to compliance with the Code.

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	Learning and improvements are included in the Council's Annual Complaint Report	<p>The Council will always look beyond the circumstances of the complaint and try to learn lessons from complaints and implement any more general service improvements to benefit residents.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Creating an accountable, continuous learning based, positive complaints culture and holistic service is a driving aim for all the solutions listed throughout the self-assessment • Implementation of new case review tools and QA monitoring • Root cause analysis training for complaint handlers
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	We discuss complaints in our departmental management meets and report on performance and quality of responses on a quarterly basis.	The Council uses the learning and feedback from complaints to inform decisions, learning and improvements across the Council. The Council continuously scrutinise complaints data to identify themes and trends so that change can be made to prevent issues occurring.

				<p>We discuss complaints in our departmental management meets and report on performance and quality of responses on a quarterly basis.</p> <p>All findings and actions highlighted in the complaints handling review aim to embed a new way of working and a new culture</p>
9.3	<p>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.</p>	Yes	<p>Wider learning and improvements are included in the annual report which goes to relevant scrutiny committees. We also discuss complaints during residents' panels</p>	<p>Learning from complaints is included in the Council's annual complaints report which goes to Cabinet and is considered at scrutiny committees. If some of the recommendations include training needs or reminders to staff, senior managers will communicate this. Residents are informed in complaints responses of any service improvements that will be implemented as a result of their complaint.</p> <p>Under the new tenant engagement strategy and model there is a clear commitment to respecting resident feedback and how this is not only implemented in the service but positive change is communicated back to the resident. Examples include: A tenant and leaseholder led review of complaint responses a minimum of once per year; communicating learning from trends in our complaints in tenant targeted</p>

				<p>communications; using complaints as a form of insight when reviewing policies.</p> <p>To effectively embed a culture of respect for resident feedback, the service responsible for engagement will carry out training and briefings with individual teams and a quality management system will be linked to the new strategy to measure impact and identify gaps in practice.</p>
9.4	<p>Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.</p>	Yes	<p>The Director of Housing Services is the appointed person</p>	<p>The Director of Housing Services is the senior lead person accountable for complaint handling for Housing Management complaints. The Director is provided with data on stage 1, stage 2 and Ombudsman enquiries and has the autonomy to direct service changes.</p> <p>The Quality Assurance and Standards Team are leading on a full review of complaints handling for Housing and feeding findings into the Director of Housing Services to lead on change.</p>
9.5	<p>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</p>	Yes	<p>The Deputy Leader of the Council is the MRC</p>	<p>MRC has been appointed as the Cabinet Member for Housing who is directly involved in the review and whose role in driving a positive complaints culture will continue to grow as we embed a new way of working. Complaints are reported quarterly to the Council's Management Team (CMT) and annually to Cabinet,</p>

	Responsible for Complaints ('the MRC').			Policy Co-ordination Group (PCG) and the relevant Scrutiny Committee.
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 MRC has access to staff who will provide the relevant information for discussion with the governing body	<p>The Deputy Leader of the Council will receive regular updates on complaint performance data and is copied into all upheld Ombudsman decisions (the anonymised report only). They have a direct line in to the Deputy Director of Democratic and Corporate Governance who oversees the corporate complaints team.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Work with the MRC to embed a new governance framework to create an effective line of sight of complaints
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ol style="list-style-type: none"> regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; regular reviews of issues and trends arising from complaint handling; regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to 	Yes	The MRC is update quarterly and received the annual complaints report which includes all the data outlined	<p>Information relating to complaints is provided quarterly to CMT which includes: volumes, performance, outcomes, compensation, root causes, and Ombudsman cases.</p> <p>All Ombudsman decisions are circulated to Corporate Directors, Directors, Heads of Service and officers involved with the complaint when the decision is received. The upheld Final Decisions are also circulated to the Chief Executive, the Leader, and Deputy Leader as portfolio holder. A summary of the upheld cases is also included in the Council's annual</p>

	<p>severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>			<p>complaints report. The self-assessment the Council undertakes in relation to the Housing Ombudsman Code will be included in the Council's annual complaints report if there have been any significant changes.</p> <p><u>Recommendations following Complaint Learning Review:</u></p> <ul style="list-style-type: none"> • Work with the MRC to embed a new governance framework to create an effective line of sight of complaints
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <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>	Yes	<p>We share our objectives with staff and contractors that are working on our behalf to ensure there is one goal and we work together to achieve it for the benefit of our residents</p>	<p>The Council works collaboratively with teams across departments to achieve a joined up approach to complaints. Council services collectively take responsibility and identify solutions to make things right.</p> <p>All findings and actions highlighted in the complaints handling review aim to embed a new way of working and a new culture</p>

Spotlight on: attitudes, respect and rights– Brent Council housing management service – self-assessment – July 2024

Recommendation	Current position	Proposed actions
Culture, vision, and values		
1 Review your mission statement to ensure it is reflective of your current, and future, service. Consider at Board level if you are assured your current approach to vulnerabilities is working.	<p>The Council does not have a set mission statement re. supporting vulnerable residents, although does have an internal Accessibility Guidance document for staff which sets out information, advice and guidance for staff to ensure any activity they undertake in the course of their work is accessible to everyone. Awareness of this document is relatively low currently and so needs to be communicated more widely.</p> <p>The Housing Management Service has recently developed an improvement plan which incorporates a commitment to developing a vulnerability and reasonable adjustments policy for the service in line with the Ombudsman's recommendations. Our approach to vulnerabilities will be reviewed as part of the development of this policy.</p>	<ol style="list-style-type: none"> 1. Embed the corporate accessibility guidance document as part of the housing management induction process for staff to improve awareness of it. 2. Review our approach to supporting vulnerable residents and develop a vulnerability / reasonable adjustment policy for the housing management service which: <ul style="list-style-type: none"> - Is cohesive with the corporate accessibility guidance; - Is reflective of the Ombudsman's recommendations; and - Meets the specific needs of our tenants.
2 Undertake a review at Board level as to whether you are currently offering a 'human-centric' service provision. If not, identify the barriers to this and what needs to change in order to introduce and then embed this culture and ethos.	A new housing management improvement board is due to be set up which will be where the delivery of the above-mentioned improvement plan and review of our approach to vulnerabilities will be monitored.	3 Set up the housing management improvement board as agreed at CMT, to monitor the ongoing improvement plan.
3 Consider adopting a values-based recruitment model to improve resident/landlord relationships.	<p>The housing management service has been working with HR to review and improve the recruitment process. Throughout the recent restructure recruitment, interviews have prioritised behaviours and values of new starters, acknowledging that specific technical skills can be developed once onboard.</p> <p>There has also been specific focus vulnerable tenants during interviews, for example, a recent question asked during interview was "What is your understanding of our responsibilities towards vulnerable tenants, and what would you do to ensure that they are appropriately supported by the service?".</p>	
What does the resident need?		

4	<p>Review your vulnerability policy in conjunction with current practice. Is the policy being implemented? If not, identify where the disconnect lies.</p>	<p>Whilst there are instances where vulnerabilities / individual needs of tenants are being proactively considered e.g. 'household audits' during planned works to assess needs and the implications of the work re. this so suitable support can be put in place, this is not documented. There is no vulnerability policy / strategy currently in place for the housing management service.</p> <p>There is also some lack of awareness re. correct safeguarding referral routes. This needs to be clarified and guidance documentation created for staff to refer to.</p>	<p>See action 2.</p> <p>4. Confirm safeguarding referral routes for housing staff, confirm forms and key contacts are correct and create guidance document.</p>
5	<p>Implement a vulnerability strategy, including how it is defined, who assesses, and what the review process is. This must be in line with The Equality Act, the Human Rights Act and the Care Act. This should be co-produced with residents, and consider any future good practice guidance published by the Housing Ombudsman, following engagement and consultation.</p>	<p>As above.</p>	<p>As above.</p>
6	<p>Implement a specific reasonable adjustments policy.</p>	<p>There is no reasonable adjustment policy currently in place for the housing management service.</p>	<p>See action 2.</p>
7	<p>Test the vulnerability and reasonable adjustments strategy and policy against the '3Rs' on vulnerable residents – recognise, respond and record.</p>	<p>NA</p>	<p>5. New vulnerability and reasonable adjustments policy to include reference to the three R's – recognise, respond and record.</p>
8	<p>Introduce minimum staff training requirements such as Dementia Friends, and training on customer care, mental health, learning disabilities, and sight and hearing loss.</p>	<p>The housing management service are in the process of developing and implementing a new induction offer which includes a set of core training courses for new starters. These courses range from more general i.e. 'supporting vulnerable customers' and 'customer care' through to specific vulnerability related courses s i.e. 'working effectively with hoarders'.</p> <p>This training programme will be embedded from end of Q2 2024-25 and will be reviewed at end of each financial year.</p>	<p>6. Moving forward, use analysis of demographic data, characteristics and known vulnerabilities across our tenant population to inform the refreshed core training programmes on an annual basis.</p>
9	<p>Consider a dedicated taskforce for vulnerability.</p>	<p>There is no specific taskforce for vulnerability currently in place, this may come out of our review and policy development work in this area. We could also consider nominating manager level 'leads' in key strategic areas i.e. vulnerability/safeguarding lead, ASB lead, property services lead.</p>	<p>NA.</p>

Look to the future

10	Carry out your own “Resident of the Future” forecast for the next ten years. Draw upon the available information around demographics, both locally and nationally, and identify where you foresee the gaps being.	Whilst light touch assessments of demographic information held has been done (and some data quality issues identified), a specific analysis has not been carried out.	7. Work with the Change and Customer Insight service to run a ‘resident of the future’ forecast and develop an approach to addressing gaps identified.
11	Consider the ageing communities specifically in rural and coastal areas, with reference to Professor Whitty's report	Approximately 27% of our tenant population is aged 65 or over, with a further 27% aged 55 – 64.	8. Consider specific staff training for supporting aging tenants and ensure the reasonable adjustments policy supports adjustments for older people as needed.
12	Devise an action plan for what you need to start putting in place from now onwards to ensure you are ready to meet the needs of your future residents. This should include the anticipatory requirement regarding reasonable adjustments.	Any actions will be agreed following the completion of the ‘resident of the future’ exercise to be carried out (see recommendation 10, action 6).	

Complaint handling

13	Raise awareness of the complaints procedure and ensure it is accessible for residents who may face barriers to raising a complaint, as required by the Complaint Handling Code	Information about how to make a complaint, our complaints policy and procedure, complaints performance and escalation options are available on our website here . The policy includes reference to accessibility options if someone needs them. The Council has previously supported national awareness campaigns such as ‘Make Things Right’ to ensure tenants who need support know how to make a complaint.	9. Include complaints awareness as part of the communications plan for the housing management service moving forward.
14	Ensure the complaints policy permits complaints about staff conduct, attitudes and approach.	Brents complaints policy does permit complaints about staff conduct, attitudes and approach.	
15	Establish and enforce a clear process for how complaints about bullying/discrimination will be investigated.	Complaints about bullying or discrimination are managed in line with our usual complaints process.	
16	Contact restriction policies must set out clear timescales, review and appeals process. Where there is single point of contact, this should be applied consistently.	The Council has a Vexatious Complaints Policy which includes reference to contact restrictions as an optional action. The policy does not set any generic timescales for review, instead requires the relevant Director to set a timeframe for each individual case.	10. Consider developing generic timescales for review of contact restrictions to ensure consistency and fairness in these cases. 11. Consider publishing the vexatious complaints policy on the website.
17	Calls to be recorded, either a physical recording or a contemporaneous telephone record.	All calls to our corporate contact centre (which is the first line of contact for tenants reporting repairs etc. by phone) are recorded. Calls to individual officer phone lines are not recorded.	

Case handlers

18	Landlords need to ensure they provide clear explanations; repeat information where needed, including in different formats; offer face-to-face contact as much as possible and a named point of contact;	Whilst it is expected that complaint case handlers meet all of the actions set out here and complaint response templates cover some of this, no specific	12. Develop guidance document for staff on expectations re. complaint responses.
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	<p>investigate concerns and share the outcome; recognise when things have gone wrong, apologise and explain how these will be addressed; and know when to make appropriate referrals to agencies and whom to signpost to. Underpinning all of these should be a baseline of empathy and respect.</p>	<p>guidance documentation is in place for staff to refer to.</p> <p>The engagement team work with involved residents on a re-occurring basis to carry out a scrutiny exercise re. complaint responses and this recommendation can be incorporated into their checks.</p> <p>There is no internal approach to regularly auditing complaints responses although our improvement plan does include this as a commitment.</p>	<p>13. Ask the involved residents to utilise the recommendation re. complaint responses set out here in their next scrutiny exercise.</p> <p>14. Develop an internal approach to auditing complaint responses.</p>
19	Ensure disability or language needs are routinely considered as part of the complaints process and that extra accessibility support, or accessible materials, are offered where appropriate.	The complaints policy includes reference to accessibility options available to those who need them and the understanding is that this should be being offered where appropriate during the complaints process.	15. Use complaint auditing to confirm accessibility support is being offered.
20	Identify where more specific training, guidance or support is needed to fulfil your role. For example, do you feel under confident in having what may be seen as a difficult conversation or delivering bad news?	Under the in-house Skills Academy, the service is developing an induction programme, along with a reactive offer to respond to training needs as and when they arise. This can incorporate any training need identified re. responding to complaints.	16. Carry out complaint response spot checks and gather feedback from complaint response handlers to identify any training requirements.
21	Maintain accurate records of residents' vulnerabilities and individual circumstances.	Data held re. resident vulnerabilities in the service's CRM system is unreliable due to issues with data quality some key functions spanning across multiple systems. The Council is currently in the process of taking a strategic look at this issue, working across areas like public health, adult social care and housing to develop a new approach to sharing and maintaining vulnerability data.	17. Feed into the corporate work ongoing re. improving our approach to recording and maintaining resident vulnerability data.
22	Use mandatory checks, such as annual boiler checks, as a 'touchpoint' opportunity to undertake welfare checks with residents.	<p>The service is implementing a programme of tenancy audits which include welfare checks. Each property will receive a tenancy audit at least once every 4 years.</p> <p>Our contractors have 'concern cards' which they can use to feedback to the service if they notice anything they want to flag re. tenant welfare.</p>	
23	Although it is important for landlords to know the vulnerabilities and individual circumstances of its residents and any associated legal duties, the above approach should apply to all residents as, fundamentally, it is about a high standard of customer care and a human-centric approach to service delivery.	This will be considered as part of the review of our approach to vulnerability and subsequent development of the vulnerability and reasonable adjustment policy.	

Spotlight on: Knowledge and Information Management (KIM) – Brent Housing self-assessment – Sep 2023

	Recommendation	Detail	Brent current position	Proposed action
Governance and Culture				
1	Define the oversight role of governance for knowledge and information management.	Governance should seek assurance that the landlord knows its products, services and residents well, and that it uses this data to inform business and financial planning.	<p>The new Data and Insight Strategy (due to be published later this year) for Brent Council includes specific commitments to developing a strong data culture across the organisation.</p> <p><u>Existing governance structures:</u> In terms of governance structures, the internal Data Ethics Board, consisting of senior council officers and independent, external data experts ensures the Council uses data in the right way, in accordance with legal, ethical and best practice guidance.</p> <p>The Information Governance Group, comprised of senior representatives from each service area, sets standards and develops the Councils approach to information governance, including sharing protocols.</p> <p>The Housing Digital Board (HDB) meets monthly to discuss digital and data challenges and opportunities specific to the housing service, escalate areas of concern and direct the digital transformation programme for the service.</p> <p>The Brent Data Network, a cross-council staff-led group open to all officers, meets regularly to share best practice and discuss and collaborate in resolving common data challenges.</p> <p><u>Examples of work ongoing:</u></p> <ul style="list-style-type: none"> • A programme of data quality work has started in Housing, with a cleanse of void property data in Northgate Housing as the first priority area and intention to move on to wider property / asset management data as a next step. • New True Compliance system has been procured so that all compliance information can be held in one place. Full transfer to this system is set for September 2023. • Engagement officers have been utilising door knocking and estate roadshow events to improve the contact data held for our tenants, specifically focusing on areas where there are gaps in contact data. 	<ol style="list-style-type: none"> 1. Review of the remit and update to terms of reference for the HDB to ensure focus is aimed at priorities for the service 2. Shape the digital programme for housing around improving data quality across the service and prioritise the work starting on Northgate Housing re. BHM housing stock, agree governance of this project with HDB. 3. Ensure BHM is in a position to meet regulatory requirements from April 2024 which requires accurate, individual property level reporting for decency, compliance and repairs and maintenance. 4. Embed a refreshed tenancy verification visit programme and ensure it is used as an opportunity to update tenant contact, socio-demographic and household information, including vulnerabilities / support needs.
2	Implement a knowledge and information management strategy	<p>This should include:</p> <ul style="list-style-type: none"> • defining knowledge and information management • clear definitions of which data repository is to be used for which datasets • the implementation of an Information Asset Register so you know what data you already have, what you don't have, and what you need • outcomes-focused data mining: what you are trying to achieve and what do you need the data for? 	<p>The new Data and Insight Strategy for Brent Council defines knowledge and information management across the organisation and sets out a delivery plan for improving data quality, the culture around data management, the technology being used and staff skills.</p> <p>The strategy includes actions to:</p> <ul style="list-style-type: none"> • Map data architecture across the organisation • Ensure 100% of information Asset Register reviews are completed annually • Improve consistency in system usage / integrate systems where possible to provide improved, more joined-up services • Develop data quality standards / measures 	<ol style="list-style-type: none"> 5. HDB to invite the Head of Change and Insight and the Strategic Data Manager (once in post) to a meeting for an overview of the new Data and Insight Strategy and a discussion re. what this means for the housing service. 6. Include reference to consistent and effective record keeping / data and information management as part of the updated JD's under the planned re-organisation.

		<ul style="list-style-type: none"> • how it aligns with the overall business strategy and the need for continuous service improvement • what the expected standards are, how they will be monitored, and the consequences of failing to adhere to them 		
3	Benchmark against other organisations' good practice in knowledge and information management.	This should underpin a continuous improvement approach to service delivery.	<p>Brent Housing Management is a member of Housemark and submits benchmarking data annually. Once a year, a tailored feedback session is also held with the Housing senior management team and Housemark data specialists with outputs from this being used to inform improvements and service plans for the following financial year.</p> <p>BHM have also recently engaged with a cross-London benchmarking group for the Ombudsman KIM report, the first meeting being due to take place at the end of September 2023.</p>	<p>7. Better utilise our membership to Housemark Clubs where there are networking and learning opportunities re. best practice by ensuring attendance from service representatives and any key learning is fed back effectively.</p> <p>8. Attendance at the London Councils KIM benchmarking group and report best practice to HDB</p>
4	Review safeguarding policies and procedures	To ensure data analysis forms part of a landlord's proactive activities to satisfy their duties	<p>The Housing Service follows corporate policies and approaches regarding safeguarding policies and procedures. There is functionality in CRM to record vulnerabilities and the tenancy audit function allows for safeguarding referrals to be made where needed.</p> <p>London safeguarding protocol*</p>	<p>9. Ensure all housing staff and contractors are trained in when and how to make a safeguarding referral</p> <p>10. Consider how safeguarding and safeguarding referral data can be better used to ensure the housing service is satisfying safeguarding duties and provide more targeted / tailored services</p>
5	Train staff on the requirements of the Equality Act 2010	Particularly with relevance to the importance of knowledge and information management as a tool for compliance	<p>Brent Council facilitates corporate Equality and Diversity training, however it is not widely known about or attended.</p> <p>There is also training available, at request, regarding carrying out Equality Impact Assessments (EIA).</p>	<p>11. Recommend that the corporate Equality Act training becomes mandatory as a refresher course, similar to that of data protection</p>
6	Review internal guidance around recording vulnerabilities	Particularly to ensure temporary, as well as permanent, vulnerabilities are recognised, recorded and then removed from records once no longer appropriate	<p>There is functionality in Housing Management CRM to record tenant vulnerabilities, however this is not kept updated in a consistent way and so is not well utilised to inform service delivery.</p>	<p>12. Review (and update as needed) functionality re. recording vulnerabilities in Dynamics, ensuring this is considered for both permanent and temporary vulnerabilities.</p> <p>13. Ensure all Housing staff are aware of the functionality and how and when to update this on customer profiles (including when to remove)</p> <p>14. Develop reporting on vulnerabilities / ensure steps are included in processes i.e. repairs that encourage checking of vulnerabilities data so service delivery can be tailored where needed</p>
Devise key recording standards				
7	Develop organisational key data recording standard requirements that will ensure good records that support the business and demonstrate compliance with national standards	This should set out the minimum standard to which data must be entered in the various databases owned by the landlord.	<p>The new Data and Insight Strategy sets out an action for generic data quality standards / measures to be developed for use across all services in Brent Council.</p> <p>There are no specific standards currently in place for the housing service.</p>	<p>15. Consider utilising the HACT data standards, as recommended under the Better Social Housing Review, to set out the requirements for housing service data management.</p>
8	Make adherence to the minimum standard for knowledge and information management part of the service level agreement with third parties	The quality of information sharing should form part of the assessment at procurement stage.	<p>This is not in place across some contracts / SLA's and, where it is, it is light touch and not rigorously managed as part of ongoing contract / SLA management.</p>	<p>16. Review knowledge and information aspects of ongoing contracts / SLA's and agree more robust approach for all future contract procurement / SLA's.</p>

9	Have a clear categorisation system for ATIS/FOI requests	This allows quick identification of whether the question has previously been answered and analysis of which systems require refinement to answer questions in future.	CRM functionality in Brent does not currently allow for clear categorisation of FOI requests.	17. Consider enhancements to CRM functionality to improve categorisation of requests coming in or look into use of AI to assess themes across FOI's. 18. Agree process for publication of FAQ's, including regularly refreshed data on key asks.
10	Publish FAQs on websites and keep them updated	This allows for information self-service and reduces resourcing requirements.	This isn't currently happening in Brent but there is the infrastructure available to do so. Moving forward, the incoming regulatory requirements to publish performance information will also support information self-service for residents.	19. Identify regular asks coming in through FOI's / service requests and publish these on Brent Open Data or the BHM pages on the website. 20. Finalise approach to publishing BHM performance data
Ensure appropriate systems are in place				
11	Review existing databases for capability and capacity to record those key data requirements	To ensure databases are capable of adequately capturing information about residents – e.g. vulnerabilities. To ensure databases are capable of adequately capturing information about homes – e.g. repairs and stock condition.	A number of systems are used to capture housing stock data including Northgate, Lifespan, Dynamics and True Compliance. Resident data is held in Dynamics.	21. Consider and confirm that systems currently in use are adequate and capable of requirements moving forward re. data capture, maintenance, and reporting for residents and housing stock information. 22. Ensure the 'golden thread' re. the Building Safety Act 2022 can be effectively delivered on through systems in use and, if not, identify alternative solution
12	Train staff on using systems	Including minimum data standards, performance measures and quality assurance processes	Training on systems takes place at the point of new systems / a change being implemented but there is currently no infrastructure in place for ongoing refresh training or structured training for new starters. There is a lack of guidance available for staff to refer to re. system use.	23. Offer to be finalised and agreed at HDB re. handover of new systems / system change which includes training to be delivered, how and by who, as well as guidance and its format i.e. 'how to' videos, written documents etc. and ownership of expertise handover to super users in operational teams. 24. Agree approach for new starter induction re. system training
13	Ensure databases are easy to interrogate, and that the data can be extracted and used	Staff should be able to easily access the information they require. This is essential for evidence-based practice and informed decision-making. Where systems can be interrogated effectively, this produces crucial insight regarding patterns, themes and potential shortfalls.	Whilst dashboard and reporting functionality is available in CRM to both officer and manager level staff, data quality in the system significantly impacts the value these currently offer and training for improved staff understanding of how to use them would be beneficial. Data quality is also a challenge in Northgate Housing which impacts effective interrogation.	25. Prioritise improving data quality across Northgate and CRM and embed exception reporting in manager dashboards so they can more easily manage case work standards across their teams. 26. Include dashboard training in any agreed training programme / ongoing training approach for the service.
14	Schedule appropriate sensitive information reviews	Resident information and personal characteristics change on a regular basis. Records should be appropriately reviewed to ensure a landlord continues to know its residents – disability or illness, financial difficulties and family composition.	Key resident information is collected at sign-up but is not consistently updated throughout the tenancy with BHM.	27. Embed a refreshed tenancy verification visit programme (detailed action under recommendation 1) 28. Embed operational performance monitoring tools so managers have oversight of tenancy verifications due, completed, overdue etc. 29. Promote how residents can update their own information and why this is important
Mergers and other structural changes				
15	Stress test systems prior to change	To identify whether they can 'talk' to each other; data can be securely transferred, and staff from each landlord can access the data they need	Whilst there are no mergers planned for BHM it is noted that, as part of the digital transformation process in Brent, stringent user-acceptance testing (UAT) and risk monitoring takes place when implementing any change to systems and/or data migration.	NA
16	Undertake a risk assessment regarding knowledge and information shortfalls before the change	This should be a living document with clear risks and mitigations documented, incorporating a review cycle and emerging risk identification. This document should continue beyond the date of change.	As above	NA

17	Proactively investigate incoming datasets during mergers	Identify gaps in the knowledge of incoming stock and residents, and work to fill those gaps.	As above	NA
18	Establish clear data exception reporting processes	This allows the new organisation to identify issues post-change quickly	As above	NA
Repairs				
19	Set out clear requirements of operatives before they are allowed to record an appointment as missed	This should include ensuring that the appointment was notified to the resident, it was made at a time they could attend, checking that any contact requests were adhered to, guidance on what level of contact (e.g., Two door knocks, calling the resident) etc	Agreement with contractor that appointments should only be logged as 'missed' when they have been previously agreed and confirmed with the tenant. Operatives will knock multiple times and wait 15 minutes before leaving.	30. Review approach to managing missed appointments with input from key stakeholders (including tenants), and ensure approach is documented and communicated to Brent staff, contractors and tenants.
20	Conduct wastage analysis on missed appointments	Use the insight generated by accurate records of missed appointments to identify efficiencies and action plans, including whether a broader time range of appointments would be of benefit.	There is no existing reporting or analysis being carried out on missed appointments.	31. Introduce reporting on missed appointments
21	Implement an automated appointment reminder system	This could take the form of text messages the day before.	There are 3 types of appointment slots available for BHM repairs (8am – 1pm, 10am – 2pm and 1pm – 5pm). Tenants receive an automated text message to confirm appointment once it is booked and a further automated message when the operative is on route.	NA



Complaints Policy

Version 9 – July 2025

Owner: Corporate Director of Finance and Resources

Version Control Table

Version Number	Date	Purpose/Change	Reviewer / Authoriser
1.0	15/05/2015	Original Policy	Director of Performance, Policy and Partnerships
1.0	24/08/2017	Revised Policy	Corporate Management Team
1.0	20/02/2019	Revised Policy	Corporate Management Team
2.0	12/03/2019	Updated Policy approved by CMT for publication on the Council's website	Head of Performance & Improvement Complaints & Fol Manager
3.0	30/04/2021	Review and amendments to current Policy	Head of Executive and Member Services Complaints & Fol Manager
4.0	16/02/2022	Review Policy and amendments made in compliance with the Housing Ombudsman Complaints Handling Code	Head of Executive and Member Services Complaints & Casework Manager
5.0	12/05/2023	Changes to stage 2 complaint sign off	Head of Executive and Member Services Complaints & Casework Manager
6.0	31/05/2024	Incorporate Complaint Handling Code changes	Deputy Director Democratic Services Complaints & Casework Manager
7.0	01/08/2024	Update to Corporate Complaint timescales	Deputy Director Democratic Services Complaints & Casework Manager
8.0	04/02/2025	Update to Remedies section	Brent Assurance Board Complaints & Casework Manager

9.0	21/07/2025	Update following Housing Ombudsman's review of the Council's Complaints Policy	Deputy Director Democratic Services Complaints & Casework Manager
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1 About this document

This document sets out Brent Council's position on complaints.

2 Policy Statement

We recognise the importance of customer complaints and welcome them as a valuable form of feedback about our services. Our aim is to resolve matters as effectively and quickly as possible. We will use the information gained from complaints to help improve the quality of our services.

- When we have done something wrong and it has had an adverse impact on a customer, we shall endeavour to put things right.
- We shall act fairly and proportionately.
- We will be open and accountable for any failures.
- We will acknowledge all complaints and respond to all complaints in a timely manner and within relevant timescales.
- If customers are dissatisfied with how we have handled their complaint, we will advise customers of their rights to appeal to the relevant body.
- We will ensure that there is a complaint provision for any Council services provided by a partner agency.
- We will learn from complaints and implement service improvements.
- We will process all personal information relating to complaints in line with the General Data Protection Regulation 2018.

3 Scope

3.1 What is a complaint?

A complaint is defined as an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual or several individuals.

Typically, a complaint could be about:

- Delay in taking action without good reason
- Failure to provide a service
- Mistakes in the way a decision was taken
- Not following the law or the Council's own rules
- Broken promises
- Giving incorrect or misleading information
- Bias or discrimination
- Rude, unhelpful or inappropriate behaviour by staff
- Poor communication

A person does not have to say the word 'complaint' for it to be treated as such, and likewise when a person states they are making a 'complaint' it may be that the issue does not fall within the category of a complaint and is more appropriately dealt via a different route such as a service request. This can include instances where a customer is 'complaining' about a problem that the Council has not created, such as neighbour noise nuisance. The same can be true for a 'complaint' received to report a repair request. These are requests to the Council for appropriate action to be taken. If a complainant expresses dissatisfaction with a response to a service request, then a complaint will be logged whilst we continue to address the issues that have been raised.

An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, we will provide details on how a complaint can be made should that individual wish to pursue a complaint with the Council about the matter.

3.2 Who can make a complaint?

Anyone who uses and/or is individually affected by our services can make a complaint. We cannot investigate complaints where there has been no personal injustice (in other words, where the complainant has not been directly affected by the matter raised).

If you require help making your complaint, you can ask a friend, family member, carer or someone you trust to talk to us on your behalf. You can also be represented or accompanied at any meeting with the Council. Whoever acts on your behalf, will need to provide written consent from you before we undertake an investigation or report our findings to them. **Any complaint that is submitted via a third party or representative is handled in line with the Council's complaints policy.**

Complainants are able to access support from external agencies and representatives in order to assist with the complaint process. These include organisations such as Citizens Advice, Age UK, MIND, equalityhumanrights.com, Carers UK, etc.

If a child or young person is making a complaint under the Children's statutory legislation, then they can request the services of an advocate and should make this request known to the Complaints Service team.

Concerns raised by partner organisations about our services and concerns raised by staff or job applicants about their employment are outside the scope of this policy. Expressions of dissatisfaction against democratic Council decisions are also not covered by this complaints policy, nor are matters that are subject to a statutory right of appeal (see Appendix 1 for a list of some of these).

Reasonable Adjustments

The Equality Act 2010 introduced the Public Sector Equality Duty (PSED) which we consider when carrying out our day-to-day functions, crafting policies and delivering services. All staff undertake equality and diversity training, which is part of the Council's essential training programme. The Council is committed to ensure that all residents can access its services and are not disadvantaged in any way. Below are some of the adjustments that can be offered:

- use of email or telephone in preference to hard copy letters
- use of plain English or Easy Read service on our website
- communication through a representative or intermediary
- rest or comfort breaks in meetings.
- provision of information in appropriate alternative formats (eg large print, Braille, coloured paper etc.)
- provision of auxiliary aids

Residents can indicate when raising a complaint whether they have any disabilities or require any adjustments. This information is then recorded on their complaint record.

3.3 How can a complaint be made?

A complaint can be made in writing, via email, by telephone, in person or by using the online form or portal. The Council also accepts complaints raised via social media channels, where the Council has an official account for that platform and the complainant directs their issue to the Council's social media account. The Council will maintain confidentiality and privacy and make contact through direct message requesting for any further details before the complaint is logged on the Council's case management system for a response in line with this policy. Complaints can also be submitted via Councilors or representatives. The Council accepts complaints in all forms including, verbal, written or online.

3.4 When can a complaint be made?

The Council will accept complaints made within 12 months of the issue occurring or the individual being made aware of the issue, unless excluded on other grounds such as the ones outlined in section 8.1 of this policy. The Council will not normally accept a complaint where the customer has delayed raising the complaint with the Council by more than 12 months.

The Council recommends that contact is made as soon as possible, to ensure access to data is readily available. Complaints exceeding 12 months will be considered on a case by case basis.

We will not investigate matters that have already been considered and addressed through our Complaints procedures. If a complainant is dissatisfied with the outcome, they have the right to escalate those matters to the relevant Ombudsman. Where legal proceedings have already been initiated, this is usually where a claim form or particulars of a claim has been filed at Court, the Council will also not investigate these matters as they will be addressed through Court proceedings.

We will not take a blanket approach to excluding complaints; we will consider the individual circumstances of each complaint. If the Council decides to not accept a complaint, the complainant will be informed of the reasons as to why the Council will not investigate under the Complaints process and be provided with escalation rights to the relevant Ombudsman.

3.5 How will the complaint be dealt with?

All complaints will be dealt with in accordance with the requirements of the Data Protection Act 2018, Equality Act 2010, subsequent legislation, and associated Council policies. We will deal with complaints on their merits, act independently, give the complainant a fair chance to set out their position, take measures to address any actual or perceived conflict of interest; and consider all relevant information and evidence carefully. Social Care complaints will be investigated in line with the current regulations. Information provided to the Council for the purposes of a complaint investigation will not be used for any other purposes without the complainant's consent unless the Council feels there is a safeguarding concern, for the protection of others, or where there is a legal duty to do so.

A copy of the Complaint Team's Privacy Notice can be found on the following link: [Complaints Privacy Notice](#). The Council will only investigate complaints made on behalf of somebody else if we have that person's explicit written permission to do so. The Council will not normally accept anonymous complaints (a complaint where a customer has not provided their contact details) unless it relates to a child or young person.

The Council will initially assess the complaint to ensure that it meets the criteria of a complaint as defined in Section 3.1 of this document, and the complainant cannot achieve a

resolution through other means such as those highlighted in Appendix 1. **The complaint will then be defined, logged and formally investigated, the complaint will be responded to within the Council's specified timescales. Details of timescales can be found in Appendix 2.**

The Council will aim to respond to complaints as early as possible and specifically where there are any risks or vulnerabilities involved and the issue is current/live. Where the complaint relates to historic issues or is complex these may take longer to investigate.

The Council will work collaboratively with colleagues and collectively take responsibility of complaints. There will be occasions where complaints that span several service areas will need to be investigated individually by each service area and their relevant parts of the complaint responded to accordingly. Similarly, if various complaints are received from a complainant which cover the same service area, the Council may group all the complaints so that the service area can investigate and provide one response.

A significant percentage of our customer-facing services are delivered on our behalf by third party suppliers/contractors. Our customers have the right to expect that our contractors will deliver a particular service to the same standards in terms of quality and customer care that we would seek to provide were it run in-house. This is also true for the handling of complaints in accordance with the Council's procedures.

Complaints received directly by our contractors will be addressed at stage 1 in line with their complaint handling processes. If the complainant remains dissatisfied with the response received, they have the option to escalate the complaint to the Council where a stage 2 investigation will be undertaken. All third party suppliers/ contractors will be required to follow the Council's complaints policy and the relevant Ombudsman's complaint handling code.

All complaints will be conducted in an impartial manner. Generally, complaints will be considered and signed off as per section 6.1 of this policy. However, if a complaint relates to the conduct of an officer of the Council, then the complaint will be passed to their line manager or a more senior manager to complete a thorough investigation and respond.

To ensure we comply with data protection rules, it may not be possible to keep you fully informed of any outcome or specific action taken against a member of staff. The officer investigating your complaint will provide you with as much information as allowed but this will be dependent on the nature of the complaint and will be considered on a case by case basis.

The Council reserve the right to use discretion when applying the policy and may deal with a complaint differently where individual circumstances merit it. Where this is the case, discretion will be applied fairly and appropriately so that complaints can be progressed in order to achieve a reasonable resolution.

Corporate Complaints

Corporate complaints involve a two-stage process. **Stage 1 complaints are logged, defined and acknowledged within 5 working days of the complaint being received. The acknowledgement will include our understanding of the complaint, the outcomes that are being sought, which aspects the Council is or isn't responsible for and if there are any aspects that are unclear clarification will be sought.** We aim to respond within 10 working days of the complaint being acknowledged. However, where a complaint is complex, covers a lot of historic data or there are various strands to the complaint, the Council may extend the complaint by up to a further 10 working days. The investigation will be carried out by officers employed in the service area to which the complaint relates. The response is signed off by the relevant Head of Service, Director or a manager delegated to act on their behalf as

appropriate. In the majority of cases, matters are resolved at this point. However, the complaint can be progressed directly to stage 2, if all or part of the complaint is not resolved to the complainant's satisfaction. Details of how complainants can escalate their complaints to stage 2 will be contained in the stage 1 response.

If the complainant does wish to proceed to this stage, although not a requirement we ask that they clearly state what parts of their complaint have not been addressed satisfactorily and the reasons why so that the investigator can focus the investigation and identify the aspects of the stage 1 that did not sufficiently remedy the complaint and for any outstanding points to be addressed in the stage 2 response.

Complainants should make any escalation request within eight weeks of a first stage response being issued, because matters become harder to investigate as more time passes. If there is a valid reason as to why a complaint will not be escalated, the Complaints Service will issue the complainant with a response detailing why it has decided not to pursue an investigation. Some of the reasons for not escalating a complaint can be found in section 8, Appendix 1.

Stage 2 complaints are investigated independently from the department by the Complaints team. Stage 2 complaints will be logged, defined and acknowledged within 5 working days from the receipt date of the Stage 2 request. The acknowledgement will include our understanding of the complaint, the outcomes that are being sought, which aspects the Council is or isn't responsible for and if there are any aspects that are unclear clarification will be sought. We aim to complete the investigation within 20 working days of the complaint being acknowledged. However where a complaint is complex, covers a lot of historic data or there are various strands to the complaint, the Council may extend the complaint by up to a further 20 working days. If the complainant still remains dissatisfied, they have the opportunity to have their complaint considered by the Local Government and Social Care Ombudsman (LGSCO) or the Housing Ombudsman, details of which will be included in the response.

Statutory Complaints

Some complaints received by or made on behalf of children regarding Children's Services can be considered under the Children's Statutory Complaints Procedure¹. The Children's Statutory Complaints Procedure has three stages.

- **Stage 1** - Stage 1 is acknowledged within 5 working days and answered by the Service Area and signed off by the relevant Head of Service or a manager delegated to act on their behalf as appropriate within 10 working days. The Stage 1 can be extended to 20 working days if the investigation is complex. The response will provide information on how to escalate to Stage 2 of the procedure.
- **Stage 2** - Stage 2 is investigated by an Independent Investigator who is independent of the Service Area and an Independent Person (independent of Brent Council but appointed by the Council). On completion and agreement of a complaint statement the investigation will take up to 25 working days, or up to a maximum of 65 working days if it is a complex case. The Independent Investigator will provide a report on their investigation to the Council, which is passed to a Director, Children and Young People, for adjudication. The Council's decision will be provided to the complainant. If the complainant remains unhappy, they will be advised on how to make a request for a Stage 3 Review Panel.

- **Stage 3** - If the complainant requests to escalate their complaint to a Stage 3 Review Panel, the Council will aim to arrange this within 30 days of the request being received from the complainant. The Panel will then provide a report to the Council, within 5 working days and the Council will send a copy of the report to the complainant at this stage. The Corporate Director of Children and Young People will adjudicate and provide the complainant with a response to the panel's findings within 15 working days. If the complainant remains dissatisfied, they have the opportunity to raise their concerns with the LGSCO.

Complaints about Adult Social Care also follow a statutory complaints procedure, which is governed by law². Statutory Adult Social Care Complaints have a one stage process which can take up to a maximum of 6 months to complete from the date of receipt. On receipt of a complaint, it is to the relevant service area for investigation. The complainant will initially receive a provisional response to their complaint within 20 working days from the relevant Head of Service. If the complainant remains dissatisfied with the outcome of their complaint, they can ask for the response to be reviewed.

It will be reviewed by the Director, Adult Social Care, or Corporate Director, Community Health and Wellbeing. Complainants are encouraged to make any escalation request within eight weeks of receiving a provisional response, listing reasons as to why they remain dissatisfied.

Once an escalation request is received, a final response will be issued to the complainant within 30 days. However, if the complaint is complex and the Council require more time to investigate, the complainant will be informed in writing of the new timescale which will be up to a maximum period of 6 months. The response will include a paragraph detailing how the complainant can escalate their complaint to the LGSCO if they wish to do so.

3.6 When will I receive a response to my complaint?

Timescales for responses will depend on the type of complaint. Corporate complaints will be acknowledged within 5 working days and will normally be answered within 10 working days of the complaint being acknowledged, and 20 working days of the complaint being acknowledged at stage 2.

There will be circumstances in which this is not possible, in which case the complaint may be extended by a maximum of 10 working days at stage 1 and 20 working days at stage 2 of the complaints process. If the case is extended, complainants will be advised of the reasons for extension, the likely response date and be provided with contact details of the relevant Ombudsman. Details of all complaint timescales can be found in Appendix 2.

On occasions where additional time is required beyond the extended timescales noted above (more than 20 days from stage 1 acknowledgement or more than 40 days of the complaint being acknowledged at stage 2) the investigator will agree with the complainant suitable intervals for being updated on their complaint.

If the Council requires more information to complete its investigation, this will be requested from the complainant and the case paused until the information is provided. If the information is not received by the specified date, the investigation may be completed based on the information that is available at the time.

Where complaints may also be connected with other procedures, such as legal or disciplinary proceedings, or we need to liaise with other parties to resolve the complaint, often, in the interests of fairness, a response cannot be provided until these processes have been completed. The complainant will be informed if the Council is unable

to respond at the time.

There may be occasions where circumstances fall beyond the control of the Council resulting in the complaint response being delayed. Depending on the circumstances, the Complaints Service may also need to pause its investigations. Where this is the case, the Complaints Service will write to the affected complainant(s) to make them aware of this with an explanation for any delays. There may also be occasions where more time is required due to the complexity of the complaint or where the complaint covers several years of history. In these instances, the complainant will be informed and updates will be agreed at suitable intervals. Once a date is known the complainant will be informed as to when they are likely to receive a response. Complaints may be extended with the approval of both parties if additional actions need to be taken to confirm or clarify a particular issue and consider any findings.

If additional related information or complaints are provided during the course of the investigation, the Council will incorporate them into the stage 1 response if the response has not yet been issued, however we may need to extend the response time to consider the new information. It is therefore important that all supporting information is provided at the time the complaint is lodged. Any new issues will be logged as a new complaint if the stage 1 has already been issued, the issues are unrelated, or it would unreasonably delay the response.

3.7 Complaint Closure

Complaints will normally be closed once an investigation has been completed and a response has been provided to the complainant. If there are any outstanding actions following a complaint response at any stage, these are logged on to the Council's complaint system with an agreed timescale and tracked to completion. Updates on these outstanding actions will be provided to the complainant. Complaints may also be closed if a resolution has been agreed and the Council are taking steps to deliver the action/s.

There may be occasions where the complainant no longer wants to pursue the complaint, for example, if their situation changes or a resolution has been provided before an investigation has been conducted. In these circumstances the complaint will be closed on the Council's system as withdrawn/not pursued.

If a complaint has been rejected for any reason, the complaint will be deemed closed as of the date the notification of the rejection is provided to the complainant. The complainant will be notified in writing where a complaint has been rejected and provided with the reasons. Some of these reasons can be found in Appendix 1.

If the complaints procedure has been exhausted and the complainant is still dissatisfied with the response provided by the Council, the next step would be to refer their concerns to the appropriate Ombudsman.

Some complaints are within the jurisdiction of the Housing Ombudsman, and others are the responsibility of the Local Government and Social Care Ombudsman (LGSCO). Occasionally a complaint may be considered by both Ombudsman schemes. Within your complaint response the Council will provide the escalation process for the most appropriate Ombudsman.

Complaints covered by the Housing Ombudsman can be referred to the Housing Ombudsman by post at Housing Ombudsman Service, PO Box 1484, Unit D, Preston,

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PR2 0ET; by using the online complaint form on their website: <http://www.housing-ombudsman.org.uk>; by email to info@housing-ombudsman.org.uk or telephone on 0300 111 3000. Please note you can contact the Housing Ombudsman Service at any point during the complaint process. It cannot investigate your complaint whilst your complaint is going through our internal complaints procedure however the Ombudsman may be able to help you reach a resolution through mediation or assistance. We cannot however prejudge any action the Ombudsman may take.

For complaints covered by the Local Government and Social Care Ombudsman, the complainant has the option of referring their complaint to the Local Government and Social Care Ombudsman (LGSCO). The Ombudsman may then consider the matter further. The address is Local Government Ombudsman, PO Box 4771, Coventry CV4 0EH (online complaint form available at: www.lgo.org.uk/making-a-complaint, telephone: 0300 061 0614).

¹ The Children's Act 1989 Representation Procedure (England) Regulations 2006, Children (Leaving Care) Act 2000, Adoption and Children Act 2002, Health and Social Care (Community Health Standards) Act 2003

² The Local Authority Social Services and National Health Service Complaints (England) Regulations 2009 ('the Regulations')

4 Remedies

4.1 Remedies Guidance

The Council follows the Local Government and Social Care Ombudsman and the Housing Ombudsman's remedies guidance for complaints. The respective guidance can be found on the links below:

Local Government and Social Care Ombudsman

<https://www.lgo.org.uk/information-centre/staff-guidance/guidance-on-remedies>

Housing Ombudsman

<https://www.housing-ombudsman.org.uk/about-us/corporate-information/policies/dispute-resolution/policy-on-remedies/>

If financial compensation is awarded this can be offset against debt owed to the Council where appropriate.

5 Vexatious Complaints

5.1 How does the Council deal with vexatious complaints and unreasonable complainant behaviour?

Managing a complaint is generally a straightforward process. As a Council, we are committed to dealing with complaints in a professional, sensitive and timely manner. In a small number of cases, complainants pursue their complaints in a way that can either impede the investigation of their complaint or can have significant resource issues for the Council. In those situations, the Council will not consider complaints that are raised in an unreasonable manner and may need to classify the complainant as unreasonable, unreasonably persistent, or their complaint as vexatious.

The Council has a Vexatious Complaints Policy, which defines unreasonable behaviour, and vexatious complaints. It provides guidance so that Council staff can deal confidently, effectively and fairly with vexatious complaints and unreasonable complainant behaviour.

Dealing with vexatious complaints and unreasonable complainant behaviour diverts time from officer's duties and has an excessive impact on resources. The Council's services need to remain fair, consistent and accessible to everyone who wishes to use them.

If a complainant has exhausted the Council's complaints procedure, they will be referred to the Ombudsman. The Ombudsman's review of the complaint is considered final; therefore, the Council will not revisit any complaints that have already been considered by the Ombudsman.

6 Responsibilities

6.1 Who will respond to my complaint?

The Chief Executive has overall responsibility for complaints and oversight of complaint outcomes, which offer valuable opportunities for learning and improvement.

Corporate Directors and Directors shall be accountable for complaints performance in their departments and shall decide on final stage complaints for their departments.

Heads of Service are responsible for ensuring that remedies and service improvements identified by complaint investigations are carried out.

All staff are responsible for supporting timely and good quality complaint responses within the Council's timeframes.

Corporate Complaints

- Stage 1: Head of Service or Service Manager
- Stage 2: Corporate Director or Director

Adult Social Care Statutory Complaints

- Provisional Response: Head of Service or Service Manager
- Final Response: Corporate Director, Community Health and Wellbeing or Director, Adult Social Care

Children Social Care Statutory Complaints

- Stage 1: Head of Service or Service Manager
- Stage 2: Directors, Children and Young People
- Stage 3: Corporate Director, Children and Young People

7 Additional Information

7.1 The Council publishes the complaints policy on the Council's website. There is a dedicated Complaints section where you can view the policy, the privacy notice and the most current annual complaints report. **The Council will consider and try to accommodate as far as possible any requests to provide the policy and any other relevant documents in an accessible format.** Relevant Council services will advertise the Complaints Policy, the Complaint Handling Code and details of the Housing Ombudsman in regular correspondence (leaflets, posters, newsletter) with service users. The Housing Management Service will also be providing information on notice boards, at Resident Associations and will include a banner advert on emails they send to residents for short periods across the year promoting the complaints process. The Council will also hold events so that tenants, leaseholders and private landlords can gather information and raise concerns.

8 Appendices

8.1 Appendix 1 – Special Cases

Some types of complaints and appeals fall outside of our complaints policy.

The following complaints are not covered by the corporate complaints procedure:

- Complaints relating to Children's and Adult Social Care (these have their own statutory procedure, detailed in section 3.5)
- Complaints against schools
- Some educational matters
- Complaints against councillors
- Anonymous complaints
- Complaints made on behalf of individuals without their explicit consent
- Liability issues that are subject to an insurance claim
- Some commercial matters
- Most complaints where the customer or the Council has started legal proceedings or court action (but not where a customer has only threatened to do so)
- Complaints that have been appealed to a Tribunal or Minister, or have already gone to Court about the same dispute

- Criminal matters
- Employment issues

The following matters have their own appeals procedure and are not covered by this policy; these include but are not limited to:

- Penalty Charge Notices
- Fixed Penalty Notices
- Planning appeals
- Appeals against statutory notices
- Appeals relating to schools and school admissions
- Appeals against Special Education Needs assessments
- Housing and council tax benefit appeals
- Leasehold Tribunals
- Council tax and valuation discount and exemption appeals
- Appeals against the refusal of disabled badges for parking exemption
- Appeals against decisions relating to homelessness
- Freedom of Information and Subject Access Request complaints
- Data Protection complaints

8.2 Appendix 2 – Timescales

Corporate Complaints

- A response will be provided within 10 working days of the complaint being acknowledged at stage 1, with an extension of up to 10 working days if complex or multifaceted.
- A response will be provided within 20 working days of the complaint being acknowledged at stage 2, with an extension of up to 20 working days if complex or multifaceted.

Children Statutory Complaints

- 10-20 working days stage 1
- 25-65 working days stage 2
- 30 working days for stage 3 panel

Adults Social Care

- 20 working days – 6 months