	<b>Cabinet</b> 12 August 2024 (cancelled)
	<b>Report from the Corporate Director of Law and Governance</b>
	<b>Lead Cabinet Member - Deputy Leader and Cabinet Member for Finance, Resources and Reform (Cllr. Mili Patel)</b>
<b>Housing Management Complaints Annual Report 2023/2024</b>	

<b>Wards Affected:</b>	All
<b>Key or Non-Key Decision:</b>	Non-Key Decision
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>List of Appendices:</b>	Appendix A – Council’s Self-Assessment against the Housing Ombudsman’s Complaint Handling Code
<b>Background Papers:</b>	N/A
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	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 2023 to 31 March 2024. The report focuses on volumes of complaints, complaint outcomes, compensation offered, and the nature of complaints as well as the 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 Council’s self-assessment against the Housing Ombudsman’s Complaint Handling Code at Appendix A.

## 2.0 Recommendation(s)

- 2.1 Cabinet are asked to note Brent Housing Management’s performance in managing and resolving complaints.
- 2.2 Cabinet are asked to note, and review Brent’s latest self-assessment against the Housing Ombudsman’s updated Complaint Handling Code.

## 3.0 Detail

### 3.1 Cabinet Member Foreword

- (a) Complaints provide important learning points for the Council and allow us to inform the Council's priorities in many different ways. Through these learning points, we can make changes to achieve and further our priorities and move forward together. Complaints provide an opportunity for the Council to understand issues and put things right, also ensuring that they do not reoccur.
- (b) Complaints are wide ranging and dealt with across the Council. Owing to this, they touch upon all the priorities within the Borough Plan as detailed below:
- *The Best Start in Life* - Being able to deal with concerns at crucial stages of people's lives allows them to get the best start in life. The Housing service provides residents with an opportunity to have somewhere to call home. For residents to live comfortably and become independent or bring up their families. Having housing as a build block to progress in life.
  - *Thriving Communities* - Providing our residents with a route to complain and provide feedback not only encourages resident engagement but allows us to make improvements and inform change. In turn, by addressing their concerns and developing solutions that will benefit them, communities are given the opportunity to thrive.
  - *A Cleaner, Greener Future* - The Council receive a number of complaints regarding environmental issues, which are reviewed and help us target specific areas. This also allows the Council to evaluate services that are being provided to ensure they meet our aspirations for a cleaner, greener future.
  - *Healthier Brent* – Complaints regarding green spaces within estates and tackling antisocial behaviour allow the Council to investigate and develop more initiatives to improve the health and wellbeing of our residents. During our complaints process we also signpost to relevant services that can assist our complainants, such as Mental Health services.
  - *Prosperity and Stability in Brent* – Analysis of complaints received about housing needs is fundamental in terms of providing the tools and initiatives to support, empower and equip residents, and ensure long term stability.

Complaints also feed into some of the current strategies, priorities and plans set out for Brent, such as the Equity, Diversity and Inclusion Strategy 2024-2028 to ensure residents and service users are provided with access to the complaints procedure and that we use equalities data to concentrate on providing support to individual needs and in line with the Public Sector Equalities Duty (PSED). The Digital Strategy 2022-2026 also plays a pivotal role when looking at how users are accessing our services and how they are logging complaints. We are making it easier for users to log complaint casework, view the history of what they have logged, and access everything in one place.

## **3.2 Background**

3.2.1 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.

3.2.2 This report focusses on complaints that fall under the Housing Ombudsman only. The report includes some data (not separated out) on properties that are managed by the Council which include I4B Holdings and First Wave Housing. Since last October 2023, complaints related to these properties have been recorded – and will be reported - separately

3.2.3 The main performance headlines from Housing Management complaints are as follows:

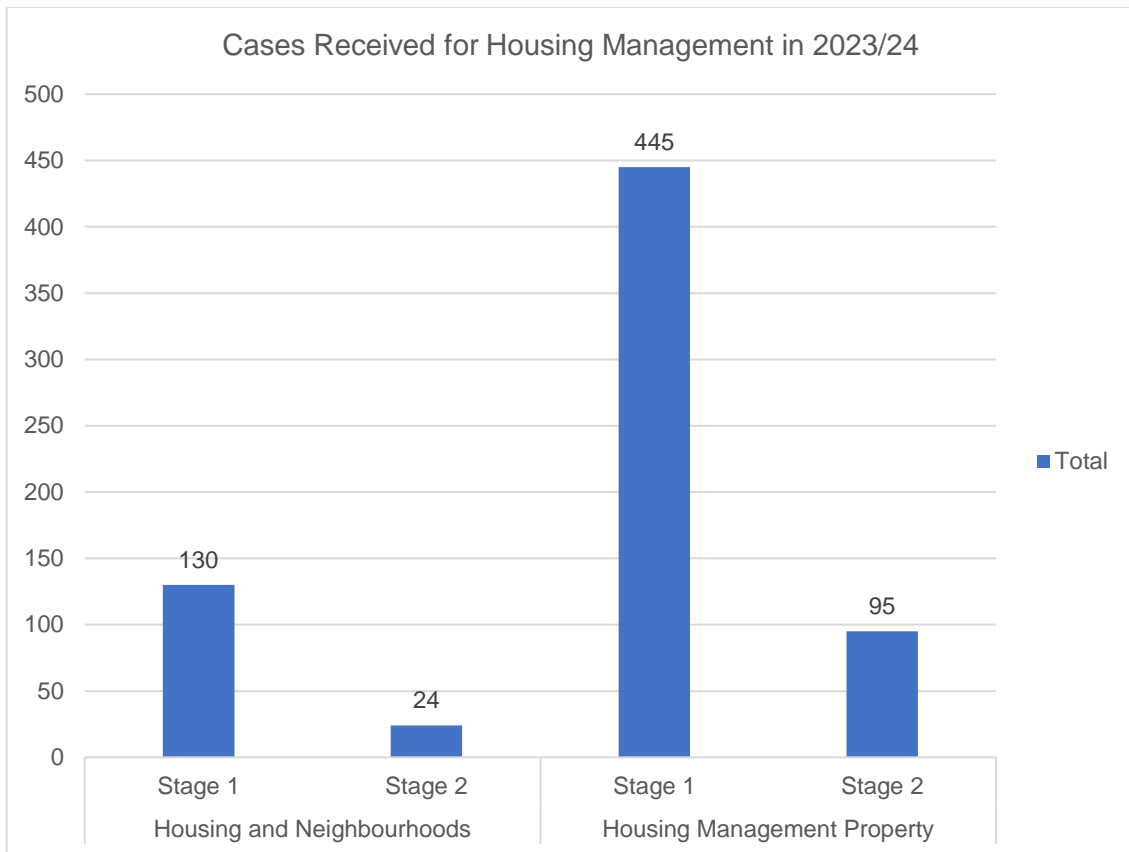
- 575 complaints were received at the initial stage of the complaints process in 2023/2024, a decrease of 26% on 2022/2023.
- The majority of issues raised related to service failure (494 complaints) and more specifically delay in a service being provided which accounted for 261 complaints.
- Many of the complaints were escalated to stage 2, because the complainant did not agree with the decision at stage 1. This was the reason in 54% of cases that were escalated.
- 291 complaints were upheld at stage 1 and 91 complaints partly upheld which provides a 64% uphold rate.
- 78% of stage 2 cases were upheld or partially upheld.
- 48 complaints were rejected at stage 1 and 1 complaint was rejected at stage 2. In 43 of the stage 1 cases, the complaint was rejected because it was a duplicate request or had already been investigated.
- 98% of all stage 1 Housing Management complaints were responded to on time and 96% of stage 2 complaints were responded to on time.
- A total of £96,024 was paid out in compensation at stage 1 and 2.

### **Housing Management Stock**

3.2.4 The Housing Management service currently manage 13,1670 properties which are a mixture of tenanted and leasehold properties. As a housing landlord, Brent manages 10,781 flats and maisonettes, 2202 houses and bungalows, as well as 187 New Accommodation for Independent Living (NAIL) properties.

### **Complaints Received**

3.2.5 In 2023/2024, the Housing Management service received 575 stage 1 complaints compared to 780 the previous year, showing a decrease of 26%.



3.2.6 The escalation rate for complaints received by Housing and Neighbourhoods is 18% compared to 21% for Housing Management Property. In 2022/2023 a total of 118 stage 2 complaints were received which is one less than in 2023/2024.

### **Nature / Reasons for Complaints**

3.2.7 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 2023/2024 rather than received. This is why the total number of complaints that we have recorded root causes for is 601 which is higher than the 575 complaints received at stage 1.

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

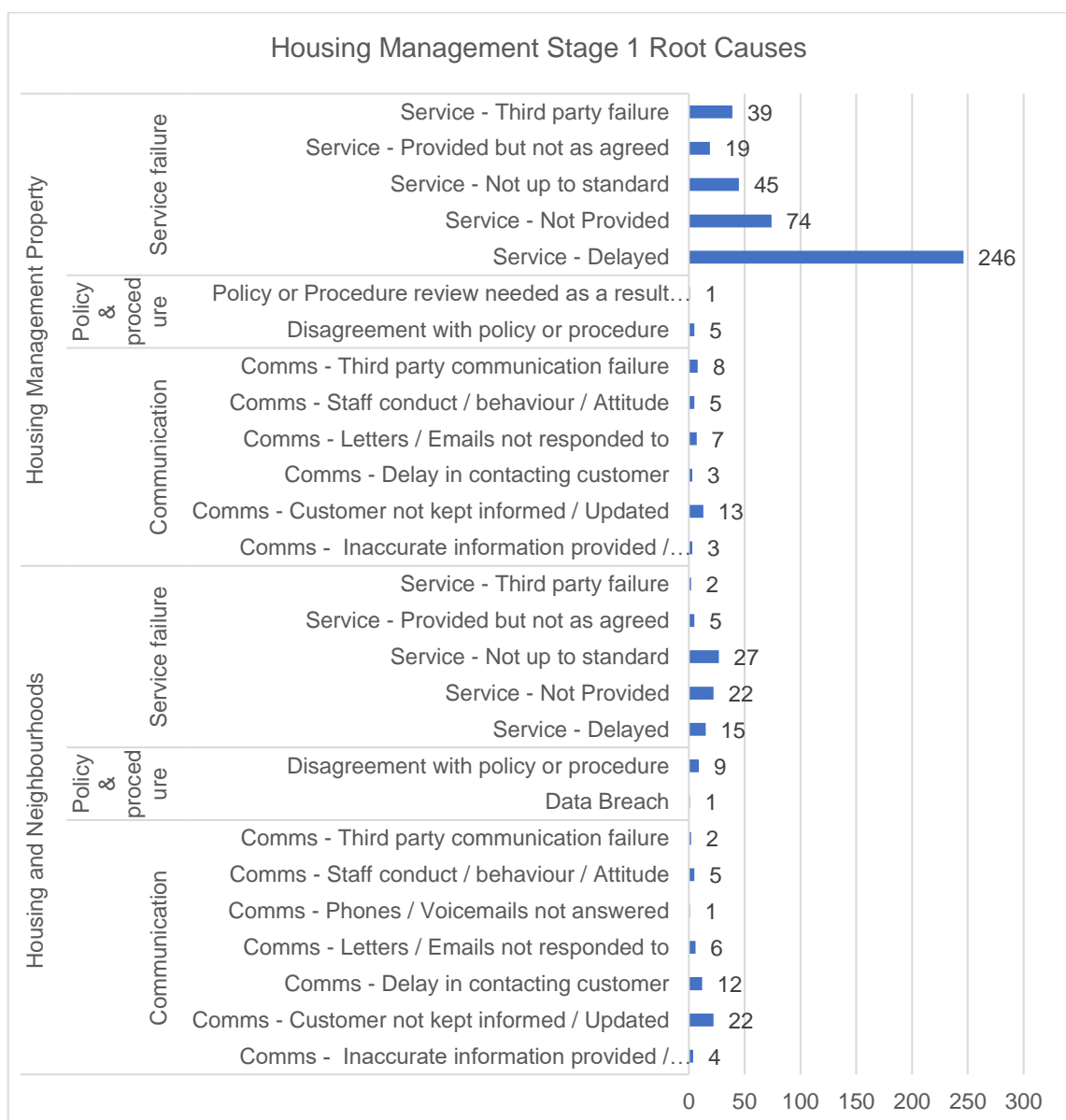
3.2.9 The data below shows that for Housing and Neighbourhoods, 53% of complaints (71 out of 133) were due to service failures and that this was primarily related to services being perceived as not meeting standards. This was the case for 27 cases which is 20%. Communication issues constituted 39% of the complaints (52 out of 133), with the predominant issue being that customers were not kept informed or updated. Policy/procedure was the root cause for 8% of complaints for Housing and Neighbourhoods.

3.2.10 In comparison, for Housing Management Property 90% of complaints (423 out of 468) were due to service failures, with delays in service provision being the main issue (246 complaints, 53%). This shows a 37% increase from Housing

and Neighbourhoods to Housing Management Property regarding service failures. The second highest root cause for Housing Management Property was communication. Communication issues made up 8% of the complaints (39 complaints) and this mainly related to failures in third-party communication (8 complaints, 2%) and lack of updates (13 complaints, 3%). Issues with policy/procedure were less prevalent at 1% with 6 complaints.

3.2.11 Overall, across Housing Management, service failure was the most common root cause for complaints. Service failure accounted for 82% of all complaints received at stage 1. Service Failure being the main reason for complaints is consistent with other local authorities.

3.2.12 Communication issues accounted for 15% of the overall complaints (91 complaints), and policy/procedure issues accounted for 3% (16 complaints).

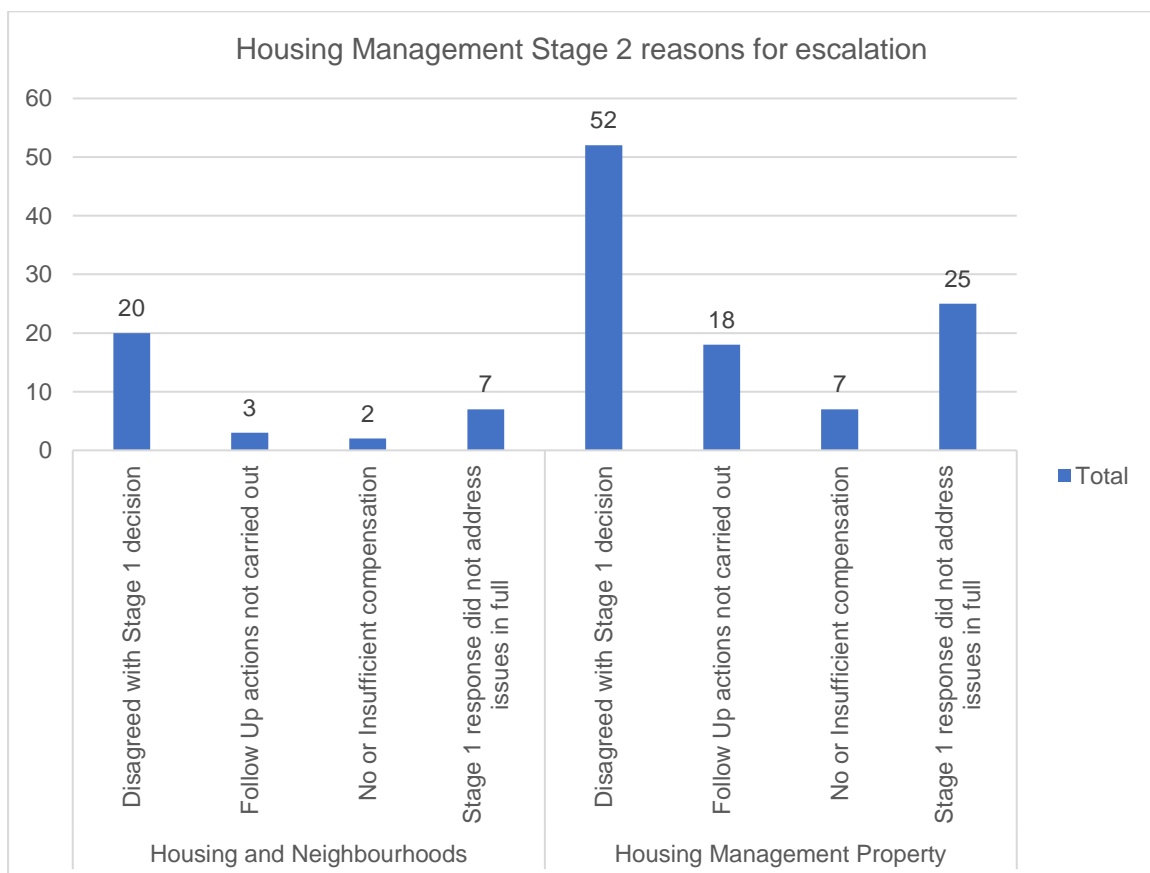


## Reasons for escalation

3.2.13 Housing and Neighbourhoods saw a total of 32 escalated complaints which provides an escalation rate of 25%. The most frequent reason for escalation was disagreement with the stage 1 decision, accounting for 63% of complaints. Other reasons included follow-up actions not being carried out (3 complaints, 9%), no or insufficient compensation (2 complaints, 6%), and that the stage 1 response did not address issues in full (7 complaints, 22%).

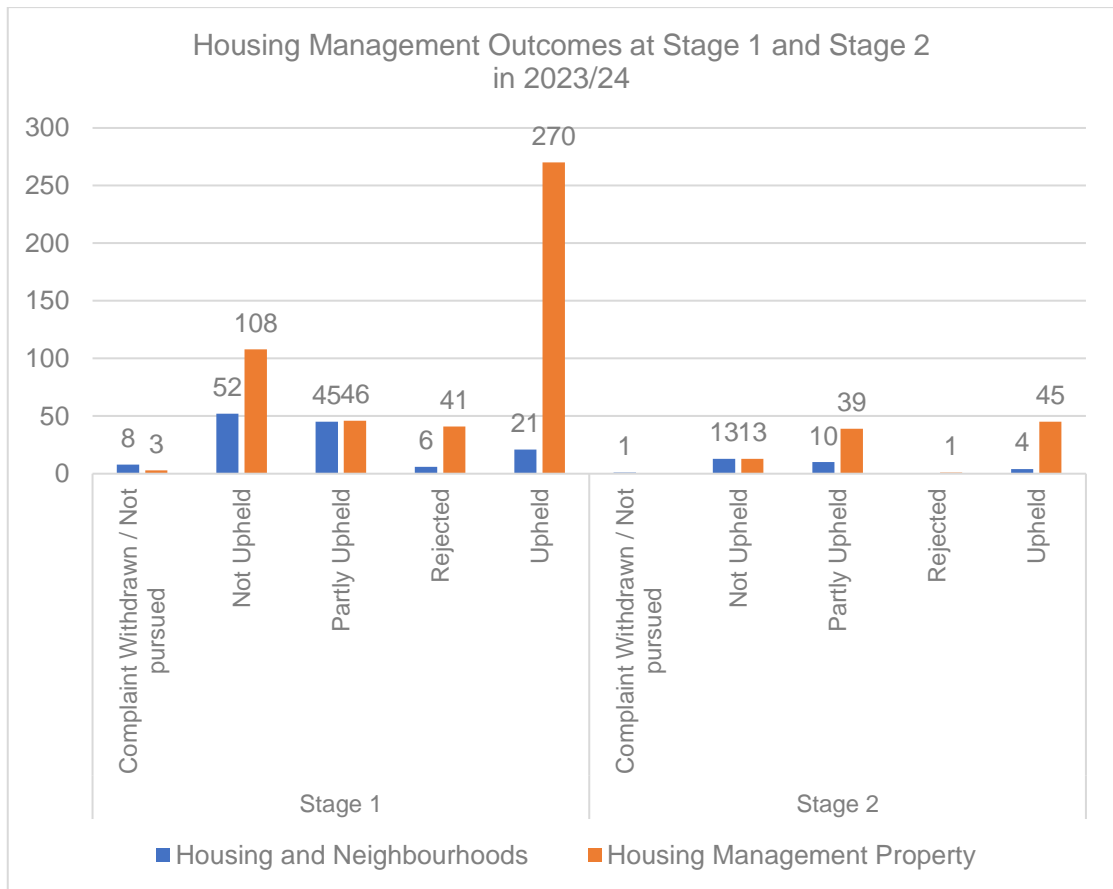
3.2.14 Housing Management Property received the most complaints and the most complaints escalated however the escalation rate was lower than the previous year at 17%. In 2023/2024, there were 102 escalated complaints. Similar to Housing and Neighbourhoods, the leading reason for escalation was disagreement with the stage 1 decision, which had 52 complaints and accounted for 51% of the escalated complaints. Additional reasons for escalation were that follow-up actions were not carried out (18 complaints, 18%), no or insufficient compensation awarded (7 complaints, 7%), and that the stage 1 response did not address the issues in full (25 complaints, 25%).

3.2.15 Overall, 134 complaints were escalated to stage 2. The most common reason for escalation was disagreement with the stage 1 decision, with 72 complaints (52 in Housing Management Property and 20 in Housing and Neighbourhoods), accounting for 54% of all complaints escalated.



## Complaint Outcomes

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



3.2.17 At stage 1 of the complaints process, for Housing and Neighbourhoods, 45 complaints were partly upheld (34%) and 21 were upheld (16%), resulting in 50% of complaints being either upheld or partly upheld overall.

3.2.18 For Housing Management Property at stage 1, 46 complaints were partly upheld (10%) and 270 were upheld (58%), resulting in 68% of complaints being upheld or partly upheld.

3.2.19 Overall, for both Housing and Neighbourhoods and Housing Management Property, 59% of Stage 1 complaints were upheld or partly upheld.

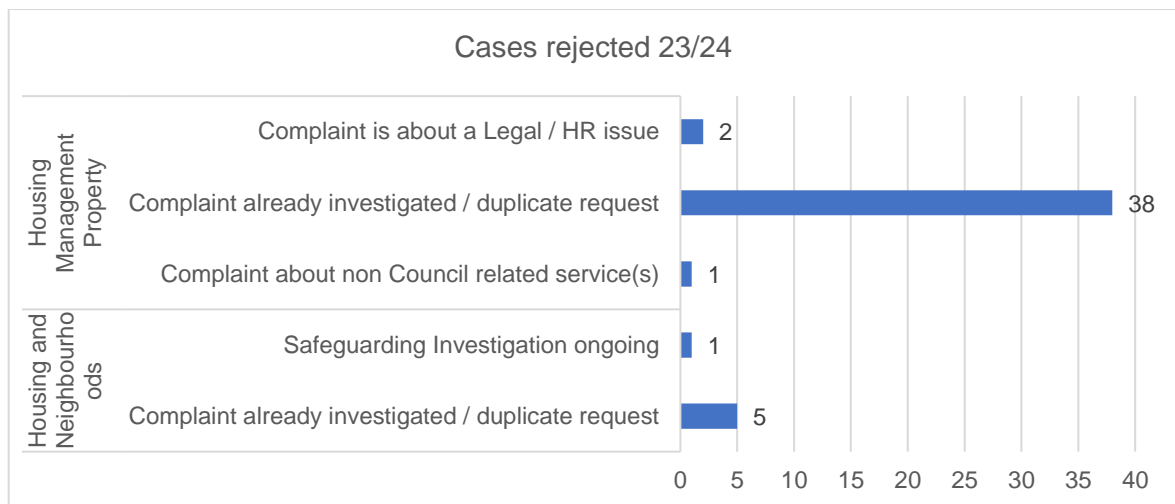
3.2.20 At stage 2, for Housing and Neighbourhoods, 10 complaints were partly upheld (36%) and 4 were upheld (14%), meaning 50% of complaints were upheld or partly upheld.

3.2.21 For Housing Management Property, 39 complaints were partly upheld (41%) and 45 were upheld (47%). This meant 88% of complaints were upheld or partly upheld.

3.2.22 Overall, for both Housing and Neighbourhoods and Housing Management Property, 78% of stage 2 complaints were upheld or partly upheld. This shows that there is a 19% increase in the complaints being upheld or partly upheld from stage 1 to stage 2 and this indicates that Housing Management could do better complaint investigations and responses at the first stage to avoid escalation to the next stage but also that the Council is willing to accept when things have gone wrong, demonstrating ownership and acceptance of issues raised.

3.2.23 The Complaints Service continues to work with managers in the Housing Management Service to ensure the quality of complaint investigations and responses provided to the complainant address all issues raised.

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



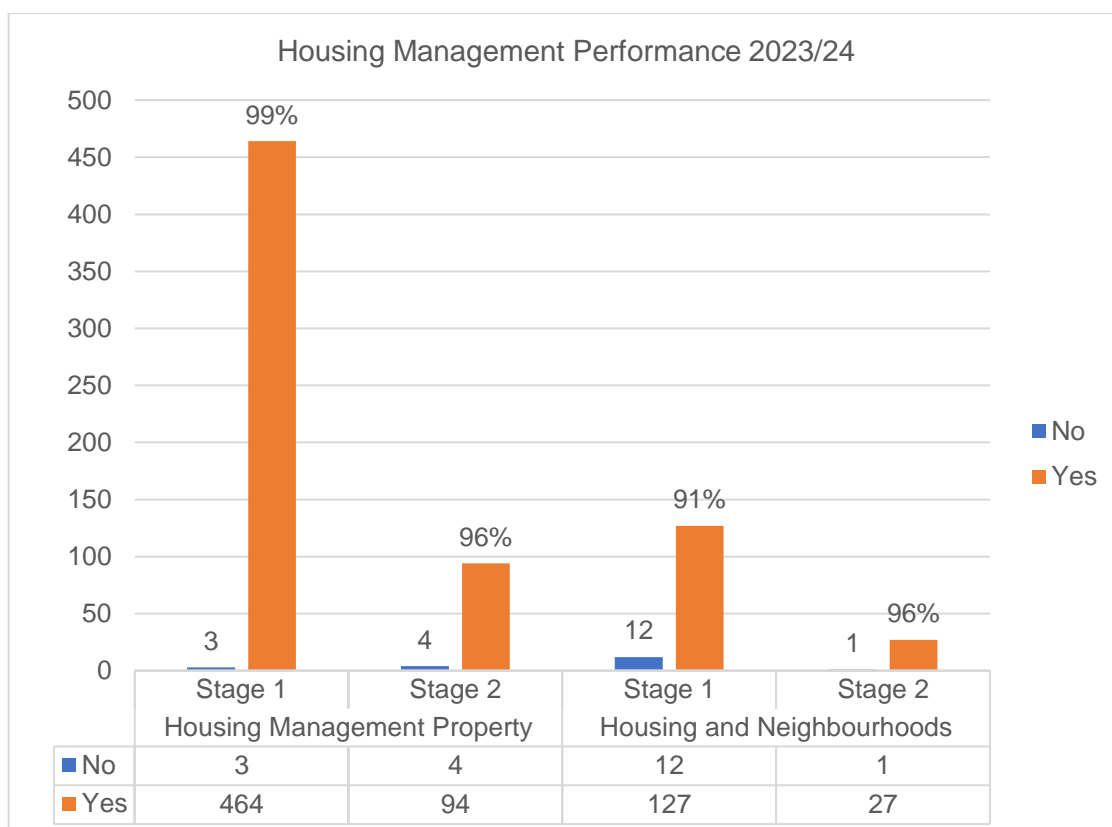
3.2.25 At stage 1, 47 complaints were rejected. As seen in the chart above, the main reason for this was that the complaint had already been investigated and that it was a duplicate complaint request. This was the reason for 91% of complaints rejected and for 43 complaint rejections overall across the Housing Management Services. In addition, two complaints were rejected due to being about Legal or HR issues and therefore were investigated through different routes. Other reasons that cases were rejected included one complaint relating to non-Council related services, and another complaint was rejected because there was an ongoing safeguarding investigation.

3.2.26 Only one complaint was rejected at stage 2. This was because it had already been investigated as part of a previous complaint and no new issues had been raised.

### Timeliness of Responses

3.2.27 The chart below shows complaint response times across the Housing Management Service in 2023/24:





3.2.28 In 2023/24, at stage 1, 99% of complaints from Housing Management Property were responded to on time, while 91% of Housing and Neighbourhoods complaints were responded to within the expected timeframe. At stage 2, 96% of Housing Management Property complaints were responded to on time, and this figure was the same for Housing and Neighbourhoods.

3.2.29 At stage 1, out of the 606 complaints due across the Housing Management Service, 591 were responded to on time. This means that 98% of all stage 1 complaints received a timely response. At stage 2, 96% of complaints were responded to on time, with this being the case for 121 of the 126 complaints due overall.

### Compensation

Stage	Total number of cases	Amount
Stage 1	154	£41,865
Stage 2	104	£54,159
<b>Total</b>	<b>258</b>	<b>£96,024</b>

3.2.30 The Housing Management Service paid a total of £96,024, in compensation for the year 2023/24, comprising a total of 258 cases. At stage 1, 154 cases were awarded compensation with a total of £41,865 compensation given overall. Stage 2 involved 104 cases, where £54,159 was awarded in compensation.

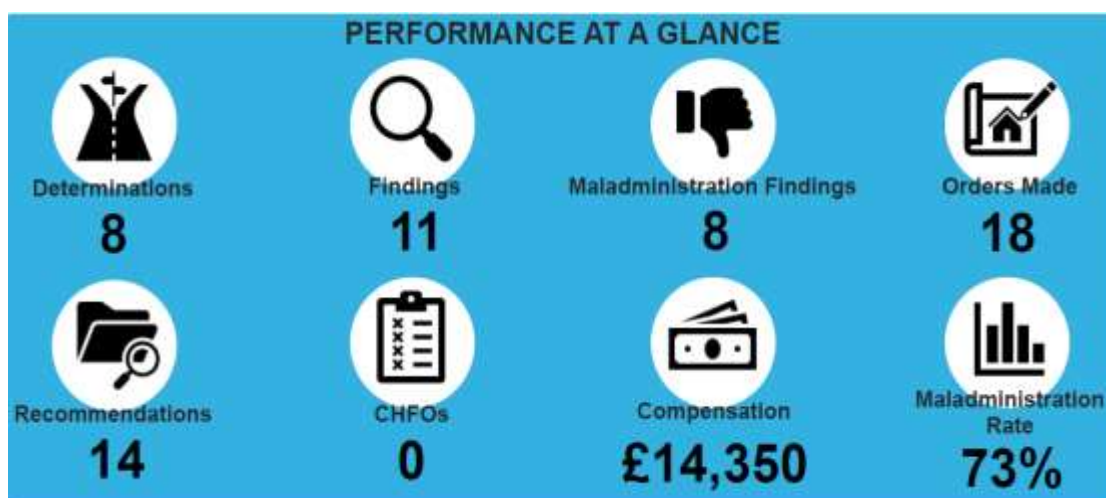
3.2.31 The main reason recorded for awarding compensation, was due to delay or failure to provide service. This accounted for 190 cases and 73% of the cases

where compensation was awarded across stage 1 and stage 2. The other two main reasons for compensation being paid were for time and trouble which was the reason compensation was given in 37 cases and reimbursement for costs incurred which was the reason given for awarding compensation in 14 cases. Other reasons for awarding compensation included distress and 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.

3.2.32 All compensation awarded by the Council should be benchmarked against the Housing Ombudsman's remedies guidance.

### **Housing Ombudsman Decisions in 2022/23**

3.2.33 The Housing Ombudsman provided its annual report on 1 August 2023 and the below information was included in the previous years' annual report. The Housing Ombudsman has set as one of its requirements in the Complaints Handling Code to add information in regards to Ombudsman cases received in the previous year. As it has not and will not provide its report until late summer/early autumn, the information provided below has therefore been taken from the Council's 2022/2023 Annual Complaints report which contains information and graphs from the Housing Ombudsman's 2022/2023 report. A copy of this annual report is available on the Council's website.



3.2.34 The performance data above relates to the Housing Ombudsman's decisions in 2022/2023. The maladministration rate is 30% higher than the previous year 2021/2022. This is mainly due to the increased awareness of the Housing Ombudsman, publication of their spotlight reports and the government's 'Make Things Right' advertising campaign. The introduction of Awaab's Law, in memory of Awaab Ishak who tragically lost his life due to conditions in his social home has also encouraged tenants to raise issues with landlords and then escalate to the Housing Ombudsman if they are not satisfied with the action taken.

3.2.35 Recent changes in legislation around consumer standards for social housing has also improved access to complaints for tenants and leaseholders. The focus is on creating a culture of accountability; where tenants voices are heard and listened to. The Social Housing Regulator and Ombudsman expect Local Authorities to actively campaign to provide access and encouragement to tenants to complain when they are dissatisfied. This should be noted as it is expected to drive up complaints, which should be welcomed as a sign of tenant engagement and participation, and an opportunity to learn what is important to residents and how to put things right.

3.2.36 Brent Council performed similarly when compared to landlords of similar size and type. Although the maladministration rate is high, there were no cases of severe maladministration or Complaint Handling Failure Orders issued.

3.2.37 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. The same can be said for compensation where the Council had already agreed to pay compensation but the Ombudsman increased the compensation amount and included the total figure awarded during the complaint process rather than the additional amount ordered or recommended. Although the graphic above, produced by the Housing Ombudsman, states that they awarded £14,350 compensation, in fact they only asked the Council to pay an additional £3,800 on top of what the Council had already offered during its complaints process.

3.2.38 The table below provides a breakdown of the areas of complaints which were received by the Housing Ombudsman in 2022/23.

Complaint Decision	Severe Maladministration	Maladministration	Service failure	Mediation	Redress	No Maladministration	Outside Jurisdiction	Withdrawn	Total
Property Condition	0	4	0	0	1	1	0	0	6
Anti-social behaviour	0	0	2	0	1	0	0	0	3
Complaints Handling	0	2	0	0	0	0	0	0	2
<b>TOTAL</b>	<b>0</b>	<b>6</b>	<b>2</b>	<b>0</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>11</b>

3.2.39 The cases related to the following sub-categories:

- Responsive repairs – leaks / damp / mould
- Responsive repairs - general
- Noise

- 3.2.40 The Council complied with all of the Housing Ombudsman's orders, achieving a 100% compliance rate.
- 3.2.41 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 A and is available on the Council's website.
- 3.2.42 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. The Damp and Mould spotlight report contained a number of recommendations for landlords. The Council therefore self-assessed against these recommendations and provided a copy of the results in last year's 2022/23 annual report. The Council have also undertaken a self-assessment against the Housing Ombudsman spotlight report on Knowledge and Information Management and are currently self-assessing against the latest spotlight report on attitudes, respect and rights.

### **Benchmarking Data**

- 3.2.43 Given the short timescale the Ombudsman has given to provide the annual report, it has not been possible to benchmark against any other Council's annual reports. However as referenced above, the Housing Ombudsman's previous annual report evaluated how the Council compared in comparison to other similar landlords based on data from April 2023 to March 2024 and found that the Council's overall performance is similar to other landlords of a similar size and type, despite the maladministration percentage being higher than the national average.

### **Customer Feedback and Engagement**

- 3.2.44 The Transparency, Influence and Accountability Standard set out by the Social Housing Regulator 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 residents and glean further information around their housing concerns and satisfaction levels.
- 3.2.45 In 2023/2024, there were 7800 tenants in Brent and the total sample size achieved for the tenant satisfaction survey was 708 responses. When asked, taking everything into account, how satisfied or dissatisfied they were with the service provided by the landlord, 125 tenants reported that they were very satisfied. 239 reported that they were fairly satisfied while 89 stated that they were neither satisfied nor dissatisfied. However, 106 tenants were fairly dissatisfied and 149 reported that they were very dissatisfied. Overall, 51.4%

of tenants that took part in the survey reported that they were satisfied with the service provided by the landlord.

3.2.46 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 55.1%. It is important to highlight that overall in terms of complaints received annually in 2023-2024, Housing repairs was one of the top concerns for residents. On average, the Housing Management Service carry out 36,000 repairs per annum, and this means that there is likely to be a correlation between the number of repairs carried out and the number of complaints received.

3.2.47 However, it is also worth noting that the proportion of 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 17.4%. This illustrates a significant area for improvement in addressing the concerns of tenants and in ensuring their overall satisfaction with the complaints handling procedure.

### **Learning from Complaints and Service Improvements**

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

3.2.49 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.

3.2.50 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) As a result of poor communication between Wates, HMS and Socotec (the asbestos contractor), regarding asbestos testing, weekly meetings with Wates were implemented to monitor follow on actions and work more collaboratively with Socotec. The Housing Management Service are working to ensure that appointments are being booked for Wates to attend, if required for assistance with access for asbestos testing.
- b) Implementing a suited key system to all void properties to avoid keys being lost and access issues resulting in delayed void turnaround. Ensuring officers are careful when handling keys to void properties and highlighting to officers the importance of carrying out thorough checks.
- c) The Housing Management Service have also carried out and overseen various types of training in order to capitalise on learnings from complaints. For example, as a result of complaints received, training has taken place on

acting in accordance with the anti-social behaviour policy, the process of complaint investigations and vulnerability assessments. Customer empathy training has also been conducted following complaints related to Wates officers' behaviour and refresher training has been provided regarding correspondence and communicating with residents with officers being reminded to read emails fully and triage to the correct service area.

- d) New procedures have been set for surveyors' inspection reports to ensure quicker turnaround times, with a separate inbox for the surveyors to send their inspection reports being created to improve the timeliness of work orders being raised following inspections.
- e) The Complaints and Casework Manager and Principal Complaints Investigator are also working with Housing Management and have also attended Housing Management Senior Team Meetings to ensure key issues are addressed as well as to discuss learning that can be taken from complaints.
- f) A copy of the Council's self-assessment against the Housing Ombudsman's Complaint Handling Code has been included in the tender pack for the new repairs contract to ensure new contractors are aware of the standards they are expected to meet.

#### **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 3.2.30 - 3.2.32 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 2023/2024 was £96,024 (258 cases), which is an increase of 26% 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 has been 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 has commenced publishing 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.

**Report sign off:**

**Debra Norman**

Corporate Director of Law and Governance



## **Comments on the report from the Leader and Deputy Leader of the Council**

We welcome this report, which is part of our longstanding political commitment to continuously improving the council and the way it works for and responds to residents.

Learning from complaints is an important part of the story for all local authorities. They allow us to reflect on where we have performed well, and where we need to go much further if we are to be trusted by residents. At Brent Council, the lessons learned from complaints are a core component of the iterative process of developing and adjusting our strategies, priorities and plans for Brent.

This report around Housing Complaints details the progress being made around our casework systems, in particular the welcome news that officers will find it easier using newer systems to access complaint casework and a fuller history of events in one place.

It is particularly encouraging news that 97% of all stage 1 complaints from housing management are responded to on time. In a perfect world, no complaint would need the intervention of the Housing Ombudsman, but when orders are received, as a council we have ensured that 100% of orders have been acted upon. Residents should take this as testimony to the fact that this council will hold its hands up when things go wrong.

Although there is welcome reading in this report, it is clear that the volume of complaints remain high, as exemplified by the level of compensation paid to residents. There are specific concerns here for the Housing team to act upon in order to avoid further Stage 2 complaints, and we hope to see significant improvements by the team over the next year as they continue the work of restructuring their teams to better respond to service pressures.

We strive to work harder to engage residents and communicate in a more systematic, regular and open way – especially if we are to maintain and restore trust in our services. Recently, the Cabinet have passed a Tenant and Leaseholder Engagement Strategy as a first step towards addressing some of the historic issues around visibility and communications; which all lead to complaints.

Over the next four years, this new strategy will signal a shift in culture that works harder to put the views and experiences of Tenants & Leaseholders in the centre of focus, and continues to address the need for high quality service delivery.

In summary:

- **Fewer Complaints:** We had a 26% decrease from last year in the number of complaints. Most complaints were about delays in service, and we are working hard to address these issues and to reduce the number of complaints.
- **Better Responses:** We resolved 97% of complaints on time at the first stage and 96% at the second stage. We will work hard to make sure that we get even better.
- **Improvements in Service:** We have made several improvements, such as better communication with contractors, a new key system for vacant properties, and additional staff training to ensure better service.
- **Your Feedback Matters:** Your complaints help us learn and improve. We are committed to making our services better and ensuring that your voices are heard.

## 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	<p>A complaint must be defined as:</p> <p><i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i></p>	Yes	<p><a href="#">Complaints Policy May 2023</a></p> <p>(Under point 3.1)</p>	<p>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.</p>
1.3	<p>A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.</p>	Yes	<p><a href="#">Complaints Policy May 2023</a></p> <p>(Under point 3.1)</p>	<p>Residents do not have to use the word complaint for it to be treated as one. As per the policy and definition above, a complaint could be made about the following:</p> <ul style="list-style-type: none"> <li>• Delay in taking action without good reason</li> <li>• Failure to provide a service</li> <li>• Mistakes in the way a decision was taken</li> <li>• Not following the law or the Council’s own rules</li> <li>• Broken promises</li> <li>• Giving incorrect or misleading information</li> <li>• Bias or discrimination</li> </ul>

				<ul style="list-style-type: none"> <li>• Rude, unhelpful or inappropriate behaviour by staff</li> <li>• Poor communication</li> </ul> <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>
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	<a href="#">Complaints Policy May 2023</a> (Under point 3.1)	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 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."
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	<a href="#">Complaints Policy May 2023</a> (Under point 3.1)	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.

1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Awareness of complaints process in tenant satisfaction surveys	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.
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## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	<a href="#">Complaints Policy May 2023</a> (Under point 8.1)	The Council accepts all complaints unless there is a valid reason not to, including where it falls within Appendix 1 of the Complaints Policy.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances	Yes	<a href="#">Complaints Policy May 2023</a> (Under point 3.4)	The Complaints Policy clearly outlines what can and cannot be considered under the Council's complaints process. The circumstances are fair and reasonable and

	<p>must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>			in line with Housing Ombudsman guidance.
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><a href="#">Complaints Policy May 2023</a></p> <p>(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: "A complaint can be made at any time; however, 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</p>

				readily available. Complaints exceeding 12 months will be considered on a case by case basis.”
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	<a href="#">Complaints Policy May 2023</a> (Under point 3.4)	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.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<a href="#">Complaints Policy May 2023</a> (Under point 3.4)	The Council will consider complaints exceeding 12 months on a case by case basis. This is noted in the Complaints Policy.

### Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint.	Yes	<a href="#">Complaints Policy May 2023</a> (Under point 3.3)	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

	<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>			<p>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"> <li>• use of email or telephone in preference to hard copy letters</li> <li>• use of plain English or Easy Read service on our website</li> <li>• communication through a representative or intermediary</li> <li>• rest or comfort breaks in meetings.</li> <li>• provision of information in appropriate alternative formats (eg. large print, Braille, coloured paper etc.)</li> <li>• provision of auxiliary aids</li> </ul> <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</p>
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				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.
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	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.
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	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.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all	Yes	<a href="#">Complaints Policy May 2023</a>	Our complaint policy is available on the Council's website in a clear and accessible format for all residents. The policy is

	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.		<a href="#">How to make a complaint   Brent Council</a>	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.
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	<a href="#">Complaints Policy May 2023</a> (Under point 7)	The Complaints Policy, the Housing Ombudsman scheme, a copy of the Council's self-assessment of the code and the Code itself are all publicised on the Council's complaints webpages. The Policy includes information about the Housing Ombudsman and the Code. 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. 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 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	Yes	<a href="#">Complaints Policy May 2023</a> (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

	accompanied at any meeting with the landlord.			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	<a href="#">Complaints Policy May 2023</a>  (Under point 3.7)	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.

#### Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	We have a Corporate Complaints team who report to the governing body.	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.
4.2	The complaints officer must have access to staff at all levels to	Yes	The Corporate Complaints team interact with staff at all	All complaint handlers receive training on dealing with complaints and complainants.

	facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.		levels and have the authority and autonomy to resolve complaints. The team also hold a compensation budget for stage 2 complaints	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	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.

## 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	<a href="#">Complaints Policy May 2023</a>	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.

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	<a href="#">Complaints Policy May 2023</a> (Under point 3.5)	If the Council feels that a complaint can be resolved at first point of contact, the resident will be asked whether they are in agreement for the service to take action. They will be told in writing that after the action is taken, if they are still dissatisfied, they can progress their complaint through the Council's complaint procedure.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	<a href="#">Complaints Policy May 2023</a>	The Council operates a two stage complaint process.
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	We have agreements in place with contractors in relation to complaints handling	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.
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	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.

5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	Complaint acknowledgements have been updated to reflect this	Complaint acknowledgements include a brief summary of the area of complaint and 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.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	Complaint acknowledgements have been updated to reflect this	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.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>	Yes	<a href="#">Complaints Policy May 2023</a>  (Under point 3.5)	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.

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	<a href="#">Complaints Policy May 2023</a> (Under point 3.6)	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.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	<a href="#">Complaints Policy May 2023</a> (Under point 3.2)	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.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	<a href="#">Complaints Policy May 2023</a> (Under point 3.5)	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 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	Yes	This is all contained within the Council's case management system and can be downloaded	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

	other parties, and any relevant supporting documentation such as reports or surveys.			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.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	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.
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.
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## Section 6: Complaints Stages

### Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	<a href="#">Complaints Policy May 2023</a>  (Under point 3.5)	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.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	<a href="#">Complaints Policy May 2023</a>  (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.

6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	<a href="#">Complaints Policy May 2023</a> (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	<a href="#">Complaints Policy May 2023</a> (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.
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.	When we request for an extension of the timescales in our email to the complainant we will include details of the Ombudsman.
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	<a href="#">Complaints Policy May 2023</a> (Under 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 completion on the Council's complaints system.
6.7	Landlords must address all points raised in the complaint definition	Yes	The Council has a template letter which officers need to	The Council addresses all points raised in the complaint, clearly providing reasons for

	and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.		follow when responding to complaints to ensure a thorough response is provided	decisions, and referencing any relevant law/good practice.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	<a href="#">Complaints Policy May 2023</a>  (Under point 3.6)	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.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and	Yes	The Council has a template letter which officers need to follow when responding to complaints to ensure all points are covered.	The Council has a template available for officers to use so that all the points (a-g) are addressed within the response.

	g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.			
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### Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	We have a two stage process, and escalation details are provided in all stage 1 responses.	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.
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	All stage 2 complaints are acknowledged, defined and logged within 5 working days as per the Complaints Policy	All stage 2 complaints are defined and acknowledged within 5 working days of receipt.
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.	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.

6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<a href="#">Complaints Policy May 2023</a> (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 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	<a href="#">Complaints Policy May 2023</a> (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	<a href="#">Complaints Policy May 2023</a> (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 shall provide a details of the Ombudsman when we require an extension of the response timescales.
6.17	A complaint response must be provided to the resident when the	Yes	<a href="#">Complaints Policy May 2023</a>	A complaint response is provided once an investigation has been completed and no

	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.		(Under point 3.7)	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.
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	<a href="#">Complaints Policy May 2023</a> (Under point 6.1)	All relevant officers are consulted before a second stage complaint response is finalised, to ensure that the decision is a properly corporate one.
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## Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> </ul>	Yes	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.	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.

	<ul style="list-style-type: none"> <li>Changing policies, procedures or practices.</li> </ul>			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<a href="#">Complaints Policy May 2023</a> (Under point 4.1)	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. The Council will try its best to manage expectations of what remedies can and cannot be delivered.
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	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.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.		<a href="#">Complaints Policy May 2023</a> (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.

## Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and	Yes	Open data link to annual reports: <a href="#">Annual Report Data</a>	The Council produces an annual report which includes our self-assessment of the



	<p>service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>			<p>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. This years' annual report will include separated data on Housing Management complaints.</p>
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</p>	Yes	<p>Copy of latest annual report on relevant website page: <a href="#">Latest Annual Report</a></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</p>

	its website relating to complaints. The governing body's response to the report must be published alongside this.			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 has gone through the relevant governance procedures and the response from the Leader and Deputy Leader has been provided within the report.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Our last self-assessment was carried out this year and was included as an appendix in our Housing Management Annual Complaints Performance and Service Improvement report for 23/24	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.
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 Annual Complaint Report	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.
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.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Wider learning and improvements are included in the annual report which goes to relevant scrutiny committees. We also discuss complaints during residents' panels	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>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 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	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	The Director of Housing Services is the appointed person	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.

9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	The Deputy Leader of the Council is the MRC	The Deputy Leader has complaints within their portfolio. Complaints are reported quarterly to the Council's Management Team (CMT) and annually to Cabinet, Policy Co-ordination Group (PCG) and the relevant Scrutiny Committee. The Deputy Leader will be known as the MRC.
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	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 Director of Law & Governance who oversees the corporate complaints team.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to	Yes	The MRC is updated quarterly and receives the annual complaints report which includes all the data outlined	Information relating to complaints is provided quarterly to CMT which includes: volumes, performance, outcomes, compensation, root causes, and Ombudsman cases. 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

	severe maladministration findings; and d. annual complaints performance and service improvement report.			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.
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	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	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.