# Housing Complaints Performance and Service Improvement Report

**June 2025** 



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#### 1. Introduction

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

- Our latest self-assessment of compliance against the requirements of the Housing Ombudsman's Complaint Handling Code.
- An analysis of complaint handling performance in the year from April 2024 to March 2025.
- Findings of non-compliance with the Code by the Ombudsman between April 2024 and 2025.
- Learning from Complaints and Service improvements.

The annual complaints performance and service improvement report and the annual self-assessment is reported annually to a Senior Officer level Landlord Board, Corporate Management Team, our two Cabinet Leads with responsibility for Housing, and Residents' Services Select Committee. The report is shared for feedback with our Tenant Complaints & Compliments Special Interest Group and is published on the council's website at <a href="Complaints - Hillingdon Council">Council</a>. Information from the report is also shared more widely with tenants. Following our 2023/24 submission, changes were made to align internal meeting dates in order to incorporate feedback on the annual submission from Residents' Services Select Committee as part of our governing body's response.

The Council's Landlord Service recognises that complaints should perform a strategic role providing an essential source of intelligence on evolving risks and performance. They have the potential to identify issues which are not being identified elsewhere and provide insight and learning to help improve services for tenants.

As part of its approach to scrutiny, from 2024/25, the Landlord Service has adopted a standard template for reporting purposes in order to 'build-up' the annual report via a series of rolling quarterly updates. These updates include documented feedback on the preceding quarters complaints from the Tenant Complaints & Compliments Special Interest Group and are reviewed by Corporate Management Team and Cabinet Member leads for the Landlord Service.

# 2. Summary of Self-Assessment against Housing Ombudsman Complaint Handling Code

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

#### Section1: Definition of a complaint - Compliant

In general terms a complaint can be considered as: "an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the council,

its own staff, or those acting on its behalf, affecting an individual or group of individuals."

#### **Section 2: Exclusions - Compliant**

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

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

Complaints can be made quickly and easily 24 hours a day, seven days a week via our website at <a href="www.hillingdon.gov.uk/complaints">www.hillingdon.gov.uk/complaints</a>. If an adjustment is needed complainants are asked to call the complaint team.

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

All staff within the team are experienced and fully trained to deal with complaints and any adjustments that are required. The training focus for complaints handling staff during 2024/25 has been on Multiverse. In addition, staff were provided with additional training by a member of staff from the Local Government and Social Care Ombudsman on 16 May 2024.

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

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

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

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

In line with the Code we have a Service Request step and 2 formal complaint stages, after which the complainant can apply to the Ombudsman.

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

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

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

We now capture all extensions granted, at what complaint stage and the reason why the extension has been granted.

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

Our self-assessment will be published on the complaint page www.hillingdon.gov.uk

# Section 9: Scrutiny & Oversight: continuous learning and improvement – Compliant

All staff involved in the management and response to complaints have received a management instruction that they are responsible for: working collaboratively to resolve resident issues, taking shared responsibility for addressing areas of development identified through complaints and acting in accordance with any relevant professional registration that they hold. These obligations are woven into relevant job descriptions when reviewed / updated or created.

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

# 3. Analysis of Complaint Handling Performance April 2024 to March 2025

The Council recognises that Complaints present its Landlord Service with valuable insight into tenants' experiences of interacting with their landlord. As a direct consequence the Landlord Service is committed to making good use of this learning in order to improve outcomes and services for tenants, bringing about change at both a service and organisational level where appropriate. As part of this learning commitment, the Landlord Service has introduced a permanent role into its structure to accelerate work on analysing trends and themes, learning from complaints and resolving underlying and recurring issues.

Effective from 2024/25, our annual reporting cycle for complaints includes a dedicated housing complaints report to Residents' Services Select Committee each April. The outcomes from this Select Committee Meeting informs the 'governing body's response' to complaint handling, performance and self-assessment against the code in advance of the annual submission to the Housing Ombudsman. Minutes from this meeting are available on the Council's website <a href="London Borough of Hillingdon - Browse meetings - Residents' Services Select Committee">Committee</a> A further corporate complaints report is provided to the Corporate Resources and Infrastructure Select Committee in September. This includes information on housing complaints associated with the Council's Landlord Service and the minutes from this meeting are available on the Council's website <a href="London Borough of Hillingdon - Browse meetings - Corporate Resources & Infrastructure Select Committee">London Borough of Hillingdon - Browse meetings - Corporate Resources & Infrastructure Select Committee</a>

Aside from monthly complaints data reporting into the Landlord governance structure, including Landlord Board and the two Cabinet Member Leads, complaints data and learning outcomes are now shared with tenants on a rolling quarterly basis via our 'Complaints and Compliments Special Interest Group.' These meetings provide a direct and ongoing opportunity for tenants to review and scrutinise data and understand how it is being used to shape the delivery of services and provide better outcomes for tenants. An overriding theme from tenants in 2024/25 was that they wanted to see improvements in the depth and breadth of complaints data shared with them during 2025/26.

In line with other housing providers complaints, a high proportion of complaints recorded in 2024/25 were focused on housing repairs. **Table 1** shows that repairs accounted for 73% of all stage 1 complaints and 84% of stage 2 complaints. This was followed by Tenancy Management which accounted for 19% of all stage 1 complaints and 9% of stage 2 complaints.

Table 1 - Breakdown of complaints by service area 2024/25

Service Area	Stage 1	Stage 2
Adaptations	11	3
Housing Repairs	338	117
Planned Works	16	8
Rent Collection	11	0
Tenancy Management	89	12
Total	465	140

Between April 2023 and March 2024, a total of 133 complaints regarding housing repairs were received, 101 stage 1 and 32 stage 2 complaints. This demonstrates the uplift in complaint numbers captured more generally and the notable 242% increase in Repairs complaints.

In terms of stage 1 complaints by the three largest service categories; 35% of Repairs complaints migrated to stage 2, 13% of Tenancy Management complaints migrated to stage 2 and 50% of Planned works migrated to stage 2. The Repairs Service is already addressing this 'conversion rate' challenge by having a clear focus on providing stage 1 responses which are both comprehensive and readily

understood by the complainant. This necessitates providing responses in 'plain English' and moving away from technical jargon and related text which may not be readily understood by the tenant and detracts from the core message of complaint resolution being shared. The Housing Management Service is ensuring that every complainant is personally contacted to ensure that the underlying reason for the complaint is fully understood and so that a tailored resolution can be proposed

As set out in Table 2, Stage 1 complaint response times were poor during the first half of the year with only half of complaints being responded to on time during the first quarter and only one in five during the second quarter. Stage 1 complaint response time improved during the second half of the year to 72% in quarter 3 and 85% during the final quarter of the year. However, despite this uplift, overall only 6 out of 10 stage 1 complaints were responded to on time. Linked to lower numbers of stage 2 complaints, response times within target were higher throughout the year culminating in an overall compliance rate of 82% for stage 2 complaints.

Table 2 - Complaint response times 24/25

	Stage 1 Nos	Stage 1 on time	% stage 1 on time	Stage 2 Nos	Stage 2 on time	% stage 2 on time
Q1	99	51	51%	23	16	70%
Q2	106	21	20%	29	26	90%
Q3	99	71	72%	49	39	80%
Q4	161	137	85%	39	34	87%
Totals	465	280	60%	140	115	82%

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

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

Tabel 3 below demonstrates that despite the upward trend in overall complaint numbers over the rolling 12 month period, the number of formal complaints captured by the Landlord Service still falls below that recorded by members of its London & ALMO benchmarking group. During 2024/25 the Council's Landlord Service received 5.7 complaints per 1,000 properties in management. This compares to an upper quartile figure of 13.53, a median of 6.46 and a lower quartile figure of 6.05.

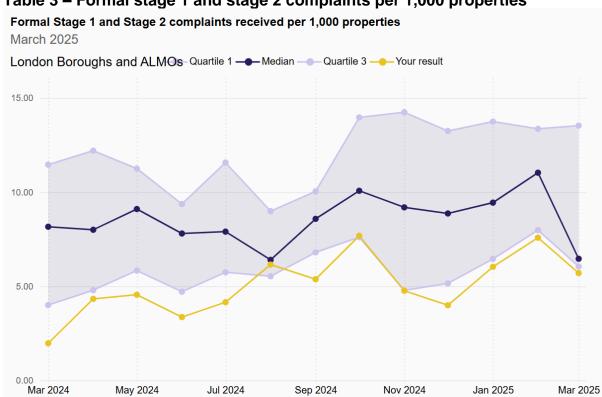


Table 3 – Formal stage 1 and stage 2 complaints per 1,000 properties

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

Under the Complaints Handling Code it is legitimate to agree an extension to the 10 / 20 day target response time with the complainant. This would be the case where the complaint is particularly complex, involving a number of service areas and collation of information. From the last guarter of the year it has been possible for data on extensions to be captured and recorded. With 19 stage 1 extensions granted in the last quarter, this represents 12% of total stage 1 complaints. With 4 stage 2 extensions granted in the last quarter, this represents 10% of total stage 2 complaints. Moving forward it is recognised that there is a clear need to better understand the reasons for these extensions, by service area, and to report the outcomes to tenants.

Of the 23 extensions granted in the final quarter of the year, 12 related to the need for additional evidence and 11 were associated with the complexity of the case. The distribution of extensions granted by function are set out in **Table 4** below:

Table 4 – Extensions by service function in quarter 4

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

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

#### 2024/25 Focus on Repairs Complaints

With just over 7 out of every 10 stage 1 complaints recorded in 2024/25 relating to the Repairs Service, further details and analysis has been included below in relation to this specific cohort of complaints.

Given the significant number of repair orders raised in 2024/25 (41,181) and the fact that the Annual Completion within target Rate for all repairs was 88.21%, it is important to get the overall level of Repairs related complaints into context. 338 stage 1 complaints represent just 0.82% of repair orders raised This suggests that while many repairs are completed successfully, a small minority experienced issues that lead to dissatisfaction.

#### **Analysis of Themes in Stage 1 Complaints**

The table below presents a breakdown of the most frequent complaint subjects categorised at Stage 1. It can be seen that the top 5 categories accounted for nearly 80% of all Repairs related complaints.

Row Labels	Number of Subject	Percentage of Subject
DISREPAIR	110	35.14%
DAMP / MOULD	44	14.06%
LEAK	36	11.50%
ROOF	35	11.18%
POLICY	21	6.71%
		<b>78.14</b> %
APPTS	17	5.43%
PESTS	14	4.47%
NEW REPAIR	14	4.47%
STAFF	9	2.88%
COMPENSATION	8	2.56%
VOIDS	5	1.60%

#### Interpretation

The data shows that disrepair is the leading cause of Stage 1 complaints, representing over 35% of the total. This broad category includes a variety of maintenance issues reported by residents, often involving multiple elements of a property falling into disrepair.

Following disrepair, damp and mould emerged as the second most common concern. This highlights the serious impact these issues have on residents' living conditions and potentially their health. Complaints related to roof problems and leaks also make up a significant portion, reinforcing the importance of addressing structural integrity.

Notably, policy-related complaints rank relatively high, suggesting a need to review and possibly clarify repair policies to ensure they are clear, well-communicated to residents and consistently applied.

#### **Analysis of Complaint Outcomes**

The table below presents complaint outcomes by proportion in relation to Repairs.

Outcome	Proportion (%)
Not Upheld	41.38%
Partially Upheld	34.23%
Fully Upheld	24.38%

#### **Common Reasons for Escalation to Stage 2 Complaints**

The key themes for complaint escalation to Stage 2 can be broadly categorised as follows:

#### Unresolved or Poorly Executed Repairs

A significant number of escalations arise from repairs that were either not completed to an acceptable standard, were excessively delayed, or were not addressed at all despite being reported. Notable examples include persistent roof leaks and incomplete guttering works. These issues were linked to contractor performance, prompting the service to place special measures on the contractor involved to prevent recurrence.

#### Communication Failures

Linked to the above issue, many complaints highlight a breakdown in communication, such as a lack of updates on repair progress, missed appointments without explanation, and inconsistent or conflicting information provided to residents.

#### Dissatisfaction with Service Delivery

A smaller proportion of escalations related to negative experiences with staff, including reports of rudeness, unhelpful behaviour, or a perceived lack of empathy. Some residents felt their concerns were not taken seriously, contributing to their decision to escalate.

#### Policy and Process Clarity

Some complaints point to confusion or dissatisfaction with how repair policies are communicated or implemented. This suggests a need to improve transparency and ensure residents have a clear understanding of procedures.

#### Complex or Exceptional Cases

A number of escalations involve more complex circumstances, such as overcrowded living conditions exacerbating damp and mould issues, neighbour disputes over shared repairs, or the aftermath of major incidents like fires.

#### **Key Areas of Learning for the Repairs Service**

Based on the analysis of complaint themes and reasons for escalation, the following key areas of learning have emerged for the Repairs Service:

#### Enhance Communication with Residents

Contractors now use the Oneserve repairs system to log all updates, including appointment changes and resident interactions. A proactive and transparent communication strategy has been implemented to keep residents informed about the status of their repairs. This includes providing realistic timelines, explaining delays, and ensuring timely notifications of appointment changes or cancellations—mirroring the approach used by in-house teams.

#### Address Root Causes of Recurring Issues

The service has analysed high volumes of complaints related to disrepair, damp and mould, roof issues, and leaks to identify systemic problems. This analysis has informed planned works projects aimed at long-term solutions, such as window replacements, thermal efficiency improvements, roof replacements and reducing property non-decency.

#### • Empower Frontline Staff and Strengthen Customer Service

Frontline staff are being equipped with the skills and authority to resolve issues effectively at the first point of contact. Emphasis is placed on empathy, active listening, and professionalism. This is supported by ongoing training delivered through toolbox talks, contract review meetings, and digital learning tools.

#### Improve Internal Coordination

A digitisation initiative is underway to enhance collaboration and information sharing across key teams—Repairs, Voids, Planned Works, Contact Centre and Compliance. This integrated approach aims to streamline service delivery and reduce delays.

#### Implement a Robust Feedback Mechanism

Regular review meetings are held to assess resident feedback and identify opportunities for continuous improvement in both the repairs service and the complaints handling process.

## 4. Complaints considered by the Housing Ombudsman

The number of complaints escalated to / considered by the Housing Ombudsman remain relatively low and fell during the second half of the year. Of the 11 complaints; one was outside the jurisdiction of the Housing Ombudsman; one was not investigated and one was not upheld. A total of 8 were upheld. This compares

with 20 complaints in 2023/24 where 10 were not investigated, 7 upheld, 1 partially upheld and 2 not upheld.

Table 4 – Complaints considered by the Housing Ombudsman 2024/25

Quarter 24/25	Considered by Ombudsman	Upheld by Ombudsman
1	4	2
2	3	3
3	1	0
4	3	3
Total	11	8

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

As stated in section 1 above, from 2024/25 the Landlord Service has adopted a standard template for reporting purposes in order to 'build-up' the annual report via a series of rolling quarterly updates. These updates include key areas of leaning and associated change by Service teams as well as documented feedback on the preceding quarters complaints from the Tenant Complaints & Compliments Special Interest Group. All changes made seek to improve outcomes for tenants. A selection of learning and change is set out below:

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

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

The management team have also made increased use of the resources which are available to landlords from the Housing Ombudsman. This includes a range of courses / webinars and access to published reports including; Insight reports, Spotlight reports, Special Investigation reports, Quarterly Complaint Handling reports and learning from severe maladministration.

The management team have made particular use of 'insight reports'. In relation to issues of dampness, condensation and mould [DCM], this included a 'self-assessment' against the themes and recommendations brought forward by the Housing Ombudsman and the subsequent production of an action plan and a DCM Policy document. The influential spot-light report on 'attitudes, respect and rights – relationship of equals' was used in January 2025 to bring forward a draft Policy on

'Vulnerable Residents and Reasonable Adjustments' which will be discussed further with tenant groups. Moving forward we will be evaluating more of our work and practices against the output provided by the Housing Ombudsman to support 'learning' and the delivery of better outcomes for tenants.

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

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

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

## Appendix A

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

### **Section 1: Definition of a complaint**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as:  '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.'	Yes	The Corporate Complaints Procedure can be downloaded from this page Complaints - Hillingdon Council This definition is included in Section 1.	This precise wording is used in Hillingdon Council's Corporate Complaints Policy and Procedure
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Presentations were delivered virtually to all staff involved in the handling of complaints that the word "complaint" did not need to be used for us to progress by way of a complaint but where dissatisfaction is expressed it needs to be brought to the attention of the complaint team for advice. Complaint handling Masterclasses are delivered four times a year for all staff that handle complaints.	
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a	Yes	The definition of a Service Request has been included in the Council's Corporate complaints procedure. They are logged, monitored and	The Council makes a distinction between a service request and a complaint.

	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.		processed in the same way as complaints and Officers in the complaints team have oversight on whether a complaint has been responded to or not. We keep records of Service Requests submitted.	
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	This is part of the Council's Corporate complaints procedure which can be accessed at <a href="https://www.hillingdon.gov.uk/complaints">www.hillingdon.gov.uk/complaints</a>	
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	We will advise someone responding to a survey where and how they can submit a complaint.	The Council recognises that survey responses may contain a 'complaint'. We ensure that appropriate signposting to the complaints service takes place, and we raise awareness of how to complain while conducting surveys.

#### **Section 2: Exclusions**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	This is included in the Council's Corporate complaints procedure in which we set out what complaints we can and cannot progress and this is also set out on the complaint web page:  www.hillingdon.gov.uk/complaints	The Policy and Procedure includes the following text: "If we consider that a complainant is unreasonable or unreasonably persistent, we will refer the matter to a senior manager, who will consider whether further investigation of the complaint will be carried out."
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:  The issue giving rise to the complaint occurred over twelve months ago.  Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.  Matters that have previously been considered under the complaints policy.	Yes	This is included in the Corporate complaints procedure and contained within the complaint page: www.hillingdon.gov.uk/complaints	The Complaints Policy includes the following text: "We will not deal with issues through the complaint procedure where a claim has been made in a court such as a disrepair claim"
2.3	Landlords must accept complaints referred to them within 12 months of the issue	Yes	This is contained within the Corporate complaints procedure	It states within our policy that "Anyone who uses our

	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.		which can be found on the following web page: www.hillingdon.gov.uk/complaints	services and is dissatisfied with the standard of service we have provided or our lack of action. The Council will also accept complaints by an advocate on behalf of a resident, with appropriate consent. However, any complaint should be made within 12 months of the issue/incident complained of."
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Included within the Corporate complaint's procedure which can be found on the following web page: www.hillingdon.gov.uk/complaints	In practice a letter is sent if a complaint is not accepted and the policy states  "If we do not intend to progress your complaint, we will inform you of this in writing, tell you why we will do this and give you the contact details of the Ombudsman to whom you may escalate your complaint to for independent review."
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Each complaint received is considered on its own merit	

# **Section 3: Accessibility and Awareness**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	This is set out within the Corporate complaints procedure which can be found on the following web page:  www.hillingdon.gov.uk/complaints	Complaints can be made in person, by telephone, in writing, via our website or email. In addition, the policy document also states that "If you need an adjustment to be made, please call the complaint team." We keep a log of all reasonable adjustments requested and our response to each request.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Information is available on Complaints and our handling of it is available on the Staff portal, setting out what they need to do and who to contact	
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	Volumes of Service Requests and formal complaints has risen when comparing 2023/24 with 2024/25 figures.	For 2023/24 we recorded 4,240 Service Requests and Formal complaints and so far for 2024/25 we have recorded 5,197 Service Requests and formal complaints. Data is benchmarked and shared with the Tenant Special Interest Group. We recognise that high volumes of complaints is positive and used to improve

				the service we already provide.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two-stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	Published on our website and it sets out the 2 Stage Corporate complaints procedure – www.hillingdon.gov.uk/complaints	We have also been meeting with residents to discuss how else to advertise and we are exploring other options such as including complaint details on Council Tax demands, rent statements and our enewsletter.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	The Corporate complaints policy is published on our website and advertised in our E-newsletter/. The policy contains information about how to submit a complaint, the contact details of the Ombudsmen and the Complaint Handling Codes are also published on our web page.	
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	The Corporate complaints procedure sets this out and it can be found at: www.hillingdon.gov.uk/complaints	The policy states that "The Council will also accept complaints by an advocate on behalf of a resident, with appropriate consent."
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Included within the Corporate complaint's procedure and it can be found at:  www.hillingdon.gov.uk/complaints	

# **Section 4: Complaint Handling Staff**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	There is a dedicated Complaint and Members Enquiry Team that processes all complaints. The annual complaint report is put before the Finance and Corporate Services Select Committee for scrutiny and then published on the complaints page, which can be found at: www.hillingdon.gov.uk/complaints	We have a corporate complaint handling team and a complaint manager responsible for processing complaints and providing advice and guidance to staff. An annual complaint report is provided for the Finance and Corporate Services Select Committee. The report contains information about complaints, compliments and Members Enquiries submitted. From 2024/25 scrutiny will also be provided prior to the annual submission to the Housing Ombudsman Service by Residents Services Select Committee which has a clear focus on the Landlord Service.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	A centralised complaint team is responsible for engaging with staff at all levels and where there are issues, they have access to senior managers for support and resolution.	We have a Corporate complaint handling team that is responsible for processing complaints, providing advice and guidance, delivering training sessions for officers across the Council and in attending management meetings to provide

				information and advice on the handling of complaints.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	A centralised complaint team is in place, where staff have been trained to process complaints, with most staff having worked in the team for over 8+ years. The complaint portal has categories to capture learning, and this is reported on in the annual complaint report, which can be accessed at <a href="https://www.hillingdon.gov.uk/complaints">www.hillingdon.gov.uk/complaints</a>	

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

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Corporate complaints procedure is the policy that we use, and it can be accessed at <a href="https://www.hillingdon.gov.uk/complaints">www.hillingdon.gov.uk/complaints</a>	
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	The Council's Corporate complaint procedure complies with the requirements set out in the Complaint Handling Codes namely a 2 Stage complaint process.  www.hillingdon.gov.uk/complaints	
5.3	A process with more than two stages is not acceptable under any circumstances as	Yes	The Council's Corporate complaint procedure sets out our 2 Stage	

	this will make the complaint process unduly long and delay access to the Ombudsman.		complaint process. www.hillingdon.gov.uk/complaints	
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	The Corporate complaint procedure states that we will progress by way of a complaint expressions of dissatisfaction in relation to "or those acting on its behalf" through our own procedure. The Corporate complaints procedure can be accessed via our web page at:  www.hillingdon.gov.uk/complaints	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	We will process complaints in accordance with the Corporate Complaints procedure.  www.hillingdon.gov.uk/complaints	Where appropriate we will ask our contactor to respond to a complaint using their own complaint procedure but where a complainant is dissatisfied with the response they receive, we will log it as a formal complaint, investigate and respond to the complainant.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	Within the acknowledgment we send to a complainant it will contain a summary of our understanding of the complaint and what they want by way of a resolution.	We will acknowledge receipt within 5 working days and inform the complainant of the reference number, who will be investigating, when they can expect a response to be sent to them, set out details of the complaint, etc. If anything is unclear, we will always ask for clarification before beginning the investigation.

5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	We will set out in our letter of acknowledgment our understanding of the complaint and what the complainant is seeking by way of a resolution. As part of the triaging of complaints, acknowledgement responses must confirm which aspects of the complaint will be considered.	We will acknowledge receipt within 5 working days and inform the complainant of the reference number, who will be investigating, when they can expect a response to be sent to them, etc. If anything is unclear, we will always ask for clarification before beginning the investigation.
5.8	At each stage of the complaints process, complaint handlers must:  1. deal with complaints on their merits, act independently, and have an open mind;  2. give the resident a fair chance to set out their position;  3. take measures to address any actual or perceived conflict of interest; and  4. consider all relevant information and evidence carefully.	Yes	This is set out within the policy statement in the Corporate complaints procedure which can be accessed at <a href="https://www.hillingdon.gov.uk/complaints">www.hillingdon.gov.uk/complaints</a>	
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	In our letter of acknowledgment, we will advise complainants the date we aim to respond by and if this is not going to be met, we will always contact them again to advise them if more time is needed.	
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any	Yes	From April 2024 we keep a log of any reasonable adjustments requested which is held on our Sharepoint	

	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.			
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	This is set out in the Corporate complaints procedure which can be accessed at <a href="https://www.hillingdon.gov.uk/complaints">www.hillingdon.gov.uk/complaints</a>	
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	All complaint data is stored on our complaint portal called GOSS including pictures, surveys, reports, etc	We also hold a record of the complaint and our responses on Sharepoint
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Our aim is to resolve a complaint, where we can, either at a Service Request or formal complaint stages. This is set out in the Corporate complaint procedure which can be accessed at <a href="https://www.hillingdon.gov.uk/complaints">www.hillingdon.gov.uk/complaints</a>	
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords	Yes	We have our "Unreasonable or Unreasonably Persistent complainant" policy which can be	Where restrictions are put in place this information is held on the Council's Restricted Persons Register

	must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.		accessed at www.hillingdon.gov.uk/complaints	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	We are required to follow the "Unreasonable or Unreasonably Persistent Complainants" Policy	This is set out in the 'Unreasonable or Unreasonably Persistent Complainants Policy" and if someone is placed on the Restricted Persons Register (RPR) they are informed of the reason, how long they are on the RPR, how they can appeal it, etc. The Corporate Complaints Policy and Procedure review process will include consideration of specific reference to the Equality Act 2010.

# **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,	Yes	Corporate complaints procedure sets this out which can be accessed at www.hillingdon.gov.uk/complaints	This is set out in the Council's Corporate Complaints Procedure

	apology or resolution provided to the resident.			
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure within five working days of the complaint being received.	Yes	Corporate complaints procedure sets this out which can be accessed at www.hillingdon.gov.uk/complaints	
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Corporate complaints procedure sets this out which can be accessed at www.hillingdon.gov.uk/complaints	
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Corporate complaints procedure sets this out.  www.hillingdon.gov.uk/complaints	Since 1 January 2025, we have a log recording all extensions granted, at what complaint stage and the reason why the extension has been granted.
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Staff in the complaint handling team ensure that when an extension is granted, the communication to the complainant provides them with the contact details of the Housing Ombudsman Service.	
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned	Yes	The complaint response will set out the actions we have taken or if they are due to be taken, when that will happen. Services have in place procedures to follow up on outstanding actions	For complaints concluded by the Housing Ombudsman Service it is the Complaint and Enquiries Team that tracks actions/orders due for completion. The complaint is only closed once all the

	promptly with appropriate updates provided to the resident.			actions have been completed and the Ombudsman informed.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	This is set out in the Corporate complaints procedure which can be accessed at <a href="https://www.hillingdon.gov.uk/complaints">www.hillingdon.gov.uk/complaints</a>	
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related, and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	Where additional issues are raised after a complaint has been submitted, we will always add these in and ensure that it is responded to within the original response and if more time is needed to do this, we will inform a complainant of this. If new issues are raised after a response has been sent, we will treat as a new complaint.	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:  a. the complaint stage;  b. the complaint definition;  c. the decision on the complaint;  d. the reasons for any decisions made;  e. the details of any remedy offered to put things right;  f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	This is included in the response that we send.	

# Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	This is set out in the Corporate complaints procedure which can be accessed at www.hillingdon.gov.uk/complaints	The formal complaint responses at Stages 1 and 2 will inform a complainant how to progress their complaint to the next stage of the process.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Yes	This is set out in the Corporate complaints procedure which can be accessed at <a href="https://www.hillingdon.gov.uk/complaints">www.hillingdon.gov.uk/complaints</a>	
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	This is set out in the Corporate complaints procedure which can be accessed at www.hillingdon.gov.uk/complaints	We will always ask a complainant for clarification otherwise the response that is sent at Stage 2 will mirror that sent at Stage 1, if we do not know what they are dissatisfied with.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	This is set out in the Corporate complaints procedure which can be accessed at www.hillingdon.gov.uk/complaints	At Stage 1 a Team Leader or Head of Service will investigate and respond and at Stage 2, this will either be a Head of Service or Director, depending on who has investigated and responded at Stage 1.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	This is set out in the Corporate complaints procedure which can be accessed at www.hillingdon.gov.uk/complaints	
6.15	Landlords must decide whether an extension to this timescale is needed when	Yes	This is set out in the Corporate complaints procedure which can be	A log is kept of all extensions granted since 1 January 2025

	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.		accessed at www.hillingdon.gov.uk/complaints	and this includes the reason why an extension was granted.
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Staff in the complaint handling team ensure that an extension communication provides the Housing Ombudsman contact details	
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	The complaint response will set out the actions we have taken or if they are due to be taken, when that will happen. Services have in place procedures to follow up on outstanding actions	
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	This is included in the response that we send.	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:  a. the complaint stage;  b. the complaint definition;  c. the decision on the complaint;  d. the reasons for any decisions made;  e. the details of any remedy offered to put things right;	Yes	The letters that we send at each stage of the process sets out our findings, the decision, the remedy (where appropriate) and to whom a complainant can request an escalation to including the Ombudsman at the final stage.	

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

# **Section 7: Putting things right**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:  • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	Yes	This is included in the response that we send	

7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	This is included in the response that we send	
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	This is included in the response that we send	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	The Complaint Handling Codes are available and key staff have received additional training from an officer in the Local Government and Social Care Ombudsman.	

# Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:  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;	Yes	An annual complaint report is provided for the Corporate Resources & Infrastructure Select Committee. From April 2025, the Resident Services Select Committee will additionally scrutinise an annual report relating to complaints managed by the landlord service during 2024/25.	

	<ul> <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>			
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	This is reported to the Corporate Resources & Infrastructure Select Committee. The report is published on the following website: London Borough of Hillingdon - Browse meetings - CABINET	For 2024/25 a separate report will be provided to the Residents' Services Select Committee ahead of the annual submission to the Housing Ombudsman Service.
8.3	Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures.	Yes	A submission is required to Cabinet where any changes are made to the Corporate complaints procedure. We will undertake self-assessments when required.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	As a result of decisions made by the Ombudsman, senior managers are made aware of the decision and actions are monitored to ensure that they are completed. Changes made are then noted and the self-assessment is then changed/added to when next reviewed.	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform	Yes	This has not happened, but it is noted.	

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.		

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

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Set out in the Corporate complaints procedure www.hillingdon.gov.uk/complaints	Once a complaint has been responded to, officers will identify any learning and set out what has gone wrong and what is being done to put this right. This includes the identification of any underlining themes and where there are issues associated with perceptions around fairness and respect.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	Set out in the Corporate complaints procedure which can be accessed at www.hillingdon.gov.uk/complaints	We are using Power BI to provide a suite of reports for staff to access which provides all staff with real time data on complaints received, lessons learnt, compensation paid, etc. This data is then used to make changes to operational practice, the review of services and to inform staff training and development.

9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	New complaint portal has been introduced as of 3 July 2023.	Our new complaint portal has been introduced in July 2023 and together with the use of Power BI it enables much more flexible and comprehensive reporting. This will increase the extent to which the council is able to learn from complaints, share the learning and institute improvements. We have a complaint and compliment special interest group and complaints data is reported into our governance structure.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	There is a dedicated complaint manager at a senior level that produces the annual complaint report for the Select committee. This has been enhanced by the new role covered by the Corporate Resources & Infrastructure Select Committee, which will act as the Member Responsible for Complaints.	Quarterly and annual corporate reports show themes and what action was taken to address them.  A new IT based system for complaints handling is being installed which will enable much more flexible and comprehensive reporting. This will increase the extent to which the council is able to learn from complaints, share the learning and institute improvements
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for	Yes	Corporate Resources & Infrastructure Select Committee,	From 2024/25 this will be added to by a timelier report into Residents' Services

	complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').		which will act as the Member Responsible for Complaints	Select Committee ahead of the submission to the Housing Ombudsman Service
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	A quarterly report has been developed that provides the Corporate Resources & Infrastructure Select Committee, with regular updates.	A rolling quarterly report is also produced for the landlord board, Corporate Management Team leads and lead Cabinet member for the landlord service.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:  a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;  b. regular reviews of issues and trends arising from complaint handling;  c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes	A quarterly report is being used to provide the Corporate Resources & Infrastructure Select Committee with regular updates.	This process was approved by Cabinet on 27 June 2024. Rolling quarterly report is also produced for the landlord board, Corporate Management Team leads and lead Cabinet member for the landlord service
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:  a. have a collaborative and cooperative approach towards resolving complaints, working with	Yes	"The Council is committed to putting people at the centre of everything we do and aims to provide the best possible service to residents. However, sometimes things can go wrong	We have a standard housing objective in relation to complaints which is also incorporated in our procedures and explains that staff involved in the

- colleagues across teams and departments;
- 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.

and if you are not happy with the service you have received from the Council then please tell us so that we can, where possible, sort out the problem.

We will carry out enquiries fairly, deal with your complaint as quickly and effectively as we can while maintaining confidentiality and keeping you informed of progress. We want to reassure you that the service you get will not be affected if you raise concerns or make a complaint.

The policy and procedure:

- allows managers to address issues of unsatisfactory service and seek improvements in service delivery;
- ensures that customers are treated fairly and consistently;
- ensures that a proper and adequate investigation takes place before any action is taken;

management and response to complaints are responsible for:

- working collaboratively to resolve resident issues
- taking shared responsibility for addressing areas of development identified through complaints
- Acting in accordance with any relevant professional registration that they hold.

	<ul> <li>requests for reasonable adjustments will be considered in line with the Equality Act 2010 and appropriate training is provided for staff; and</li> <li>safeguards the integrity and good reputation of the Council."</li> </ul>
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Governance				
Effective from:	March 2025	Review Date:	March 2026	
Report Owner:	Dan Kennedy, Corporate Director – Homes & Communities			
Report Author:	Ian Anderson, Business Manager – Complaints and Enquiries			
Approved by:	Landlord Board and Corporate Director – Homes & Communities			
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