



City of London Corporation
Department of Community & Children's Services
Housing Service

Housing Complaints Policy

Approved by:	<i>Housing Management & Almshouses Sub-Committee</i>
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Review Date:	<i>September 2021 (this version – v.3)</i>
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Next Review Date:	<i>September 2024</i>

1. Purpose and scope

1.1 We have this policy because we want our residents and service users to know about our approach to complaints. We aim to provide good quality services but sometimes we get it wrong. When this happens, we want to make it as easy as possible for residents to tell us and know that we will respond positively, quickly and fairly.

1.2 This policy applies to:

- City of London tenants, leaseholders and freeholders who receive services from the Housing Service
- Those affected by the City of London Housing Service
- Those applying for services delivered by the City of London Housing Service

2. Policy aims and objectives

2.1 Our priority is to put things right when they go wrong. To help us do this, we aim to deliver an excellent complaint handling service that puts the complainant at the heart of what we do and gives them the chance to express their point of view and the outcome they are seeking.

2.2 A key objective of this policy is to help us better understand the resident experience. We will use this insight as an opportunity to learn and continually improve our services.

3. Definitions

3.1 We have adopted the following definition of a complaint from the Housing Ombudsman's Complaints Handling Code:

A complaint is 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 resident or group of residents.

3.2 Regardless of the definition that we adopt, if a resident tells us that they are not satisfied with a service we will take steps to resolve the issue as quickly as possible.

4. Exclusions

4.1 We cannot always accept a complaint. Sometimes we will have valid reasons such as the following:

- **Age** – The issue giving rise to the complaint occurred more than 6 months ago, unless it is a recurring problem.
- **Legal action** – A complainant pursues the issue through a legal route. This will not stop us trying to resolve the issue.
- **Previous complaints** – A matter has already been considered and reviewed using the complaints service
- **Not within our control** – Complaints about services, people or bodies over which we have no control.
- **Insurance claims** - A claim for damages or personal injury which will be dealt with as an insurance claim.
- **Alternative appeals or review procedures** – Issues over which there is an alternative redress process.

If we cannot accept a complaint, we will explain the reasons to the complainant.

5. **Service standards**

- 5.1 When we provide a complaints service, residents can expect the following from us:

- To be provided with information about our complaints service in a variety of formats
- If we do not accept a complaint, we will explain the reasons why
- Use plain language and make clear the outcome of the complaint
- Acknowledge a complaint within 2 working days
- Provide a response at Stage 1 of our process within 10 working days
- Provide a response at Stage 2 of our process within 20 working days of the complaint being escalated.
- When we offer a remedy, we will set out what we intend to do and the timescales
- If we decide not to escalate a complaint, we will provide an explanation

6. **Legislation and regulation**

- 6.1 This policy will have regard to the following requirements of the Regulator of Social Housing:

Value for Money Standard – We will make the best use of our resources by learning from complaints and minimising mistakes.

Tenant Involvement and Empowerment Standard - We will adopt an approach to complaints that is clear, simple and accessible and ensure that complaints are resolved promptly, politely and fairly.

- 6.2 In July 2020 The Housing Ombudsman published a Complaints Handling Code. In addition, the November 2020 Social Housing White Paper proposed a new charter for social housing which includes an expectation that residents will have their complaints dealt with promptly and fairly. This policy will ensure we comply with the Code and that we are able to meet the expectations of the White Paper and subsequent legislation.

7. Our approach to complaints

7.1 Access

We will make the complaints service accessible to all residents using a range of channels through which residents can make a complaint, including our website and any official social media platforms. We will comply with our Equality Act duty and tailor our service to meet an individual's needs, making whatever adjustments are required.

We will accept complaints made by a resident's representative and fully engage with representative when we handle the complaint. We will also encourage and signpost residents to advice and advocacy services as appropriate.

We will ensure that all staff understand the difference between a service request and a complaint and are aware that complaints can be received verbally.

7.2 Awareness

We will raise awareness of our complaints service. We will use our website, newsletters and leaflets to ensure residents know how to complain.

As part of the information that we make available to residents we will include contact information for the Ombudsman. We will explain the role of the Ombudsman and ensure residents are aware that they can contact the service at any point for help and advice throughout their complaint.

7.3 Complaints handling

We want to make complaint handling a resident friendly experience. Our Housing Complaints Team will take responsibility for a complaint and work with colleagues to find a speedy resolution. Complaints will be acknowledged and recorded, and early contact made to ensure we understand the issues and the outcome the resident is seeking.

Our priority will be to resolve the complaint at the earliest opportunity. We will ask residents to allow us the opportunity to find a speedy resolution. Where the complaint requires formal consideration, we have a two-stage process.

The first stage will be a full and fair investigation. The investigation will be carried out by a senior manager who will be impartial and seek the information they need to find an outcome that would resolve the matter for the resident.

When it is not possible to find a resolution, we have a second stage in our process that allows residents to request a review of their complaint. The review will give residents the opportunity to challenge the earlier decision.

We will not unreasonably refuse to escalate a complaint to the next stage. If we refuse to allow escalation, we will explain the reasons for our decision.

When a resident is not satisfied with our response, we will ensure that are aware of how to contact the Housing Ombudsman. We will fully co-operate with the Ombudsman and continue to look to resolve the complaint.

7.4 Communication

We will make information about our complaints service available in clear and accessible formats. All our communications will use plain language. When we respond to complaints, we will make the outcome clear and explain the reasons for any decision made. We will keep residents regularly updated using methods of communication agreed with the resident.

Where a resident's expectation is unrealistic or unreasonable, we will explain this to the resident. If we consider that it may help to resolve a complaint, we seek the complainant's permission to engage with professional mediators as an alternative means of finding an effective resolution.

We will report back to our involved residents on our performance and ensure that information is regularly provided to all residents on how well we are delivering

our complaints service and improvements that have come about as a result of complaints.

7.5 Putting things right

We know that for most complainants when we have failed to provide a service the priority is to put things right. We will apologise and set out the actions we will take to resolve the complaint. Any remedy that is offered by us will reflect the extent of the service failure and the impact on the resident. When needed we will exercise appropriate discretion to find a remedy.

We recognise that finding a remedy may not in itself repair our relationship with our resident. In order to build confidence, we may at times engage the services of an independent third party to investigate or review a complaint.

7.6 Learning and improvement

We will ensure that we learn from complaints to keep improving. We will look beyond individual complaints to identify where our processes or policies need to change. We will ensure that this approach is part of our service planning framework and informs staff training.

7.7 Unacceptable complainant behaviour

If a complainant behaves unreasonably at any stage of the complaints process, we will apply our policy on unreasonable behaviour. Unacceptable or unreasonable behaviour could include:

- making numerous complaints about minor matters or matters which staff cannot change, which take up an unreasonable amount of staff time
- contacting multiple officers to complain about the same issue
- being abusive or offensive to staff or using inappropriate language
- making unfounded or unsupported complaints that may be malicious in nature.

If we consider a complainant to be unreasonable, we may close an existing complaint down or limit the means by which the resident can communicate with us. Once a decision has been made, we will inform the complainant and explain the reasons for our decision.

8. Responsibilities, monitoring and performance

- 8.1 Overall responsibility for this policy and its implementation rests with the Head of Housing Management. The Head of Housing Management will ensure that staff receive the appropriate training and support to achieve the aims of this policy. Where needed we may establish appropriate operational procedures.
- 8.2 Monitoring of the implementation of this policy and our performance in handling complaints will be the responsibility of the Housing Management and Almshouses Sub-Committee. We will provide complaints performance information to this Committee twice per year. Performance on complaints will also be included in our Annual Report for Tenants. We will carry out regular self-assessments against the Complaints Handling Code and ensure that our performance measures drive improvements.

9. Associated policies

- Compensation Policy
- Vexatious Complaints Policy (DCCS)

10. Document Management

Policy title	Housing Complaints Policy
Date created	September 2021 (v.3)
Policy owner	Head of Housing Management
Authorised by	Housing Management and Almhouses Sub-Committee
Date authorised	20 September 2021
Review period	3 years
Date of next review	September 2024

Consultation and assessment	
Resident consultation	Housing User Board (HUB), September 2021
Data Protection Impact Assessment	Not required. Minimal risk of data breaches. Use of personal data covered by Privacy Notice.

Document review history			
Version	Date amended	Date approved	Key changes
1.0		May 2017	New policy
2.0		May 2019	Re-approval only
3.0	Sept. 2021	20/09/2021	Stage three removed to comply with Ombudsman's Complaints Handling Code Stage Two timescale extended to 20 working days