

Committees: Community and Children’s Services Committee – For decision Housing Management and Almshouses Sub-Committee – For Information	Dated: 04/07/2024 09/10/2024
Subject: Housing Complaints Policy Update	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	Providing Excellent Services
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	£
What is the source of Funding?	
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Judith Finlay, Executive Director of Community and Children’s Services	For Decision
Report author: Liam Gillespie, Head of Housing Management, Department of Community and Children’s Services, Housing Division	

Summary

The City Corporation is a compulsory member of the Housing Ombudsman scheme, which has a Complaint Handling Code (“the Code”) for social landlords which stipulates how complaints from residents should be handled.

The Code became statutory from 1 April 2024, in accordance with the Social Housing (Regulation) Act 2023. Landlords are now required to complete and publish an annual self-assessment against the Code. The Housing Division’s self-assessment has been finalised, and updates have been made to the current Housing Complaints Policy to reflect new or changed requirements of the Code.

Performance information on complaints will be submitted to every meeting of the Housing Management and Almshouses Sub-Committee from October 2024, to give Members greater oversight of our work in this area, and our compliance with the Code.

A revised Compensation Policy is being developed and will be submitted for Sub-Committee approval in October 2024.

Recommendation

Members are asked to:

- Approve the updated Housing Complaints Policy for use by the Housing Division

Main Report

Background

1. The City Corporation is a compulsory member of the Housing Ombudsman Scheme, which provides a free, impartial, and independent service for investigating complaints from tenants and leaseholders. Their remit is set out in the Housing Ombudsman Scheme.
2. The Ombudsman has issued a Complaint Handling Code (“the Code”), which sets out the Ombudsman’s expectations of social landlords in relation to complaints. The Code has existed for several years, however from 1 April 2024 it became statutory in accordance with the Social Housing (Regulation) Act 2023.
3. Self-assessment against the Code is now required annually, along with compulsory performance reporting in complaints handling. The self-assessment and annual performance report must be submitted to Members and published online.
4. The Code also sets out how landlords must respond to complaints and imposes a two-stage process. Further provisions are made around access to complaints processes, ensuring fairness and impartiality, and ensuring landlords put things right when fault is found.

Current Position

5. The Housing Complaints Policy was last approved by Members in September 2021. Since then, the Complaint Handling Code has been updated twice. In response to the most recent iteration of the Code, the policy has been reviewed and some amendments made to better reflect the requirements of the Housing Ombudsman. These are set out in more detail in **Appendix One**, though some examples include:
 - Increasing the time in which a complaint must be made from 6 months to 12 months
 - Clarifying information on the application of discretion when considering applying an exclusion
 - Being clearer about timescales for acknowledging complaints and applying extensions
 - Including information on performance reporting and governance oversight, to reflect the requirements of the Code
 - Reflecting the nomination of a Member Responsible for Complaints and Senior Lead Person, as previously agreed at Committee

Proposals

6. Members are asked to approve the updated Housing Complaints Policy (**Appendix Two**), which provides a public statement of our approach to complaints from residents and underlines our commitment to meeting the requirements of the Housing Ombudsman's Complaint Handling Code.
7. The policy will next be reviewed in 2027, or sooner if there are changes to regulation or good practice in this area.

Corporate & Strategic Implications

Strategic implications

The provision of a robust complaints process supports the outcome of 'Providing Excellent Services' in the Corporate Plan 2024-29, through learning from complaints which will inform adjustments and improvements to service provision.

Financial implications

None.

Resource implications

None.

Legal implications

None.

Risk implications

The Housing Complaints Policy addresses our approach to complying with regulatory requirements around complaints, and through regular monitoring will reduce the risk of non-compliance with the relevant Consumer Standards (set by the Regulator of Social Housing) and the expectations of the Housing Ombudsman.

Equalities implications

The updated policy addresses how we will take account of situations where equalities considerations are engaged, and how we will respond. This may include the making of reasonable adjustments to enable complainants to participate in the complaints process more easily, and separate policies on Reasonable Adjustments and Equality, Diversity and Inclusion are in place within the Housing Division. Officers responsible for complaints handling, and staff generally, will be provided with training on these areas, to ensure compliant practice and reduce the risk of discrimination or unequal treatment.

Climate implications

None.

Security implications

None.

Conclusion

8. In response to the recent changes to the Housing Ombudsman's Complaint Handling Code, officers completed a self-assessment which has resulted in updates being made to the Housing Complaints Policy.
9. Members are asked to approve the revised policy for use by the Housing Division, to ensure that it reflects current regulatory requirements. A revised Compensation Policy will be submitted to the Housing Management and Almshouses Sub-Committee in October 2024, along with a performance update on housing complaints.

Appendices

- Appendix One: Table of revisions to current Housing Complaints Policy
- Appendix Two: updated Housing Complaints Policy (version 4)

Liam Gillespie

Head of Housing Management

Department of Community and Children's Services – Housing Division

T: 020 7332 3785

E: liam.gillespie@cityoflondon.gov.uk