

**HOUSING OPERATIONS BOARD**  
**WEDNESDAY, 31ST JULY, 2024 AT 6.00 PM IN COMMITTEE ROOM 1 - CHANTRIES,**  
**MILLMEAD HOUSE, MILLMEAD, GUILDFORD, SURREY GU2 4BB**

**Members (Councillors):**

Councillor Julia McShane, Leader of the Council (Chair)  
Councillor Bilal Akhtar  
Councillor Philip Brooker  
Councillor Amanda Creese  
Councillor Vanessa King  
Councillor Maddy Redpath

**Members: (TEG Representatives):**

Dale Askew  
Patricia Ayling  
Pat Conroy  
Alan Wood

**Officers:**

Julian Higson, Joint Strategic Director, Housing and Environment  
Annalisa Howson, Assistant Director for Housing  
Siobhan Kennedy, Homelessness, Advice & Allocations Lead  
Meena Lota, Housing Insight and Improvement Senior Specialist  
Hazel Craig-Waller, Projects Officer – Housing Insight & Improvement Specialist  
Gavin Luke-Deschanel, Complaints Resolution Officer  
Lisa Holt, Performance & Insight Officer  
John Armstrong, Democratic Services & Elections Manager

**A G E N D A**

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**July 2024**

**Draft Housing Operations Board Terms of Reference**

The Council wish to establish a Housing Operations Board, under the Executive Working Group protocol.

Remit to:

1. promote tenant and leaseholder engagement in decisions relating to the Council's housing services,
2. include stakeholders in strategy, policy and performance reviews,
3. provide support and challenge to service improvement initiatives and
4. provide assurance of the Council's work to meet the Regulator of Social Housing Consumer Standards.

The Board will comprise of:

- The Executive Portfolio Holder with responsibility for Housing (Chair)
- Four Guildford tenant members (one may be a leaseholder) including the Tenant Engagement Group (Vice-Chair)
- Two Homelessness representative members (one service user with lived experience and a manager from a service provider)
- Four non-Executive members

**Tenant members** of the Board will be nominated by the Tenant Engagement Group Chair, from existing engaged tenants and leaseholders and be appointed by Chair and Vice Chair of the Board.

**Homelessness representative members** will be nominated by the Homelessness, Advice and Allocations Lead and be appointed by Chair and Vice Chair of the Board.

**Non-Executive members** of the Board will be invited to express an interest in the Board and be appointed by Portfolio Holder for Housing and/or Leader of the Council.

Substitutes are permitted for Tenant, Homelessness representative and non-Executive Board members

**Frequency of meeting**

The Board will normally meet every eight weeks, except the months of August and December, and will be held in Surrey school term time.

The Chair may reschedule or call ad hoc meetings as required.

Meetings of the Board will normally be held in public and attendance by tenants, leaseholders and members is encouraged.

### **Invited Speakers**

The Board may invite other stakeholder representatives including for example service users, statutory agencies, voluntary sector groups for specific items.

### **Specific terms of reference:**

The Housing Operations Board will receive reports on matters relating to the Council's housing functions. These will include:

- The HRA Business Plan and budget
- The Housing Service Plan
- Quarterly KPIs performance reports
- Tenant Satisfaction Measures
- Health and Safety and energy efficiency compliance reports
- Complaints Reports inc Housing Ombudsman self-assessment
- Housing Improvement (Transformation) Plan progress reports
- Other matters relating to the delivery of the housing landlord function, with an emphasis on meeting the requirements of the Regulator of Social Housing Consumer Standards
- Reviews of existing policies or the introduction of new policies relating to or affecting Council's services
- Matters relating to tenant scrutiny and challenge as part of delivering co-regulation of the housing landlord service
- Reviews and development of related strategies inc Housing Strategy, Homelessness Strategy and Housing Asset Management Strategy.

NB Reports listed are indicative not prescriptive nor exhaustive. The Board may request additional information related to the housing services.

### **Scope**

The Board will provide review and advice on reports related to housing management and maintenance, tenant engagement, asset management, homelessness advice and allocation, tenancy and estate management, leasehold management and compliance.

The Board will **not** review the private rented sector housing service in environmental/regulatory services, nor housing development in asset services. The Council has a Housing Development Board to consider future developments,

The scheme of delegation identifies the decision-making remit and responsibilities of the officers, Portfolio Holder for Housing, Executive and Council. Where reports

relate to items for officer and Portfolio Holder decision, the comments and recommendation of the Board will be considered, as part of the consultation process. Where reports relate to items which will be submitted to the Council’s Executive or Council for decision, the comments and recommendations of the Housing Operations Board will be submitted within the officer report.

Version	Date	Originator	Comments	Approved
Draft 1	3 June 2024	Annalisa Howson	First draft for discussion with Democratic Services, Portfolio Holder	
Draft 1.1	19 June 2024	Annalisa Howson	Share with PH and TEG for agreement	
Draft 1.2	28 June	Annalisa Howson	Add homelessness reps	
Draft 1.3	12 July	Annalisa Howson	Included feedback from TEG and governance officer	

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## **Guildford Borough Council – Housing Ombudsman self-assessment form**

*April 2024*



As a member of the Housing Ombudsman scheme, we are committed to ensure we are compliant with the Housing Ombudsman's [Complaint Handling Code](#).

Each year, we must undertake a self-assessment against this code to ensure our complaints policy remains in line with its requirements. Below is the latest self-assessment, which will be reviewed throughout the year.

**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>Section 3 of our complaints policy defines a complaint as:</p> <p>“A complaint is 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 a group of individuals.”</p>	<p>We have broadened the language in the Housing Ombudsman’s definition from “landlord” to “council and “residents” to “to individuals”.</p> <p>This is to reflect our role and function beyond being landlord but as a local authority – the terminology we use is in line with the Local Government and Social Care Ombudsman’s definition of a complaint which incorporates the Housing Ombudsman’s definition.</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>Section 8 of our complaints policy says:</p> <p>" Each complaint will be considered on its own merits and will consider the individual circumstances of each complaint and does not have to use the word ‘complaint’ for it to be treated as such."</p>	<p>As set out in our complaints policy.</p>



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			Section 5 of our policy sets out that anyone can make a complaint, including third parties on behalf of an individual.	
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	Section 4 of our policy defines the matters that are not complaints, including:  “First time customers making a request for a service (such as removal of fly-tipping, missed waste collection, reporting noise nuisance, or reporting a housing repair).”	As set out in our complaints policy.
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	Section 3 of our policy states that a complaint can be about:  “A failure to deliver a service which meets reasonable expectations”	When such circumstances occur, we will continue to seek to provide a resolution to the service request, whilst processing their complaint in line with our policy.
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	Yes		In all future consultations or resident engagement we undertake in our capacity as a landlord, we will look to include details of how residents can complain.

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
	complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.			

## 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	<p>Section 8 of our policy says:</p> <p>“Each complaint will be considered on its own merits”</p> <p>Section 4 of our policy sets circumstances where our complaints policy cannot be used. Furthermore, this section says:</p> <p>“If we decide not to accept a complaint, an explanation will be provided to you setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.”</p>	As set out in our 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 must be fair and reasonable to residents. Acceptable exclusions include:	Yes	<p>Section 4 of our policy sets circumstances where our complaints policy cannot be used, including:</p> <ul style="list-style-type: none"> <li>• “Circumstances where the issue giving rise to the</li> </ul>	There are further exclusions included within this section that relate to the council’s duties as a local authority, as opposed to its duties as a landlord.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<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>		<p>complaint occurred over twelve months ago.</p> <ul style="list-style-type: none"> <li>• Situations where 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>	
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>Section 6 of our policy says:</p> <p>“We will accept complaints referred to us within twelve months of the issue occurring or the resident becoming aware of the issue unless they are excluded on other grounds (set out above). We will consider whether to apply discretion to accept complaints made outside this time limit on a case-by-case where there are good reasons to do so.”</p>	<p>As set out in our complaints policy.</p>
2.4	<p>If a landlord decides not to accept a complaint, an explanation must be</p>	Yes	<p>Section 4 of our policy sets circumstances where our</p>	<p>As set out in our complaints policy.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		complaints policy cannot be used. Furthermore, this section says:  “If we decide not to accept a complaint, an explanation will be provided to you setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.”	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Section 8 of our policy says that:  “Each complaint will be considered on its own merits and will consider the individual circumstances of each complaint”	As set out in our 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. 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	<p>Section 7 of our complaints policy says:</p> <p>“We acknowledge that we may receive a range of complaints in a variety of ways including by phone, in person, in writing, and online.</p> <p>Complaints should preferably be received in writing and whilst we encourage use of our online form, we will accept any written communication. If a complaint is made via social media, we will signpost you to our complaints process to ensure it is properly logged, investigated, and responded to. In all cases, we will provide reasonable assistance to convert any form of contact, regardless of how it is initially made, into writing or other accepted mediums (such as an online form) where the</p>	As set out in our complaints policy.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			<p>complainant has a genuine need for support in doing this.</p> <p>When you are making a complaint, support with the process is available from our Customer Services team, who can assist with any issues.”</p> <p>Furthermore, section 15 of our policy says:</p> <p>” We will comply with the Equality Act 2010, and where appropriate will make reasonable adjustments to our policy and procedure to accommodate an individual’s needs.”</p>	
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	<p>Section 7 of our policy says:</p> <p>“We acknowledge that we may receive a range of complaints in a variety of ways including by phone, in person, in writing, and online.”</p>	We recognise the wide range of ways in which complaints can be made and will endeavour to ensure all staff are aware of how complaints need to be processed.
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	Yes	Section 16 of our complaints policy says:	As part of our annual reporting, we will review the number of complaints at all levels to assess the visibility

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	complaint volumes are potentially a sign that residents are unable to complain.		“We will produce an annual complaints performance and service improvement report for scrutiny and challenge”	and accessibility of our complaints process.  We recognise the requirement of the Code. As such, when we review our complaint metrics for complaints, we ensure that there is no target or focus upon reducing the number of complaints we receive as that could lead to a negative outcome.
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	Section 1 of our policy says:  “We will ensure that details of our complaint’s procedure remain published on our website and are available in printed form (on request) for customers who do not have access to the internet.”	Our complaints policy, and information about our complaints process is available via the council’s website:  <a href="#">What complaints do we deal with? - Guildford Borough Council</a>
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	Section 1 of our policy says:  “We will ensure that details of our complaint’s procedure remain published on our website and are available in printed form (on request) for customers who	The equivalent information for the Local Government and Social Care Ombudsman is also included in the policy for complaints not about the council’s role as a landlord.



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			<p>do not have access to the internet.”</p> <p>Section 12 of our policy states that:</p> <p>“As a landlord, we will provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only at the point they have exhausted our complaint process.</p> <p>The outcome of a complaint will include the right to refer the complaint to the Housing Ombudsman.</p> <p>To contact the Housing Ombudsman please see their website: <a href="http://www.housing-ombudsman.org.uk">www.housing-ombudsman.org.uk</a> or call them on 0300 111 3000.</p> <p>Once we receive notification from the Housing Ombudsman Service that they are investigating a complaint we will</p>	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			assist with the request and provide the Ombudsman with the information they require.”	
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	Section 5 of our policy says:  “The affected person may choose for someone else to complain on their behalf such as a relative, carer or friend”	As set out in our complaints policy.
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	Section 12 of our policy states that:  “As a landlord, we will provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only at the point they have exhausted our complaint process.  The outcome of a complaint will include the right to refer the complaint to the Housing Ombudsman.  To contact the Housing Ombudsman please see their website: <a href="http://www.housing-ombudsman.org.uk">www.housing-</a>	The equivalent information for the Local Government and Social Care Ombudsman is also included in the policy for complaints not about the council’s role as a landlord.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			<p><a href="http://ombudsman.org.uk">ombudsman.org.uk</a> or call them on 0300 111 3000.</p> <p>Once we receive notification from the Housing Ombudsman Service that they are investigating a complaint we will assist with the request and provide the Ombudsman with the information they require.”</p>	

## 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	<a href="#">Executive Heads of Service for Community Wellbeing - Guildford Borough Council</a>	The Assistant Director of Communications and Customer Services has overall responsibility for complaint handling. They are supported in this role by the Customer and Case Services team. There is a dedicated Complaints Resolution Officer in the Housing Department. Liaison with the Housing Ombudsman Service and the Local Government and Social Care Ombudsman is undertaken by the Strategy and Performance Team.
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	Section 1 of our policy says: "This document sets out our approach to dealing with customer complaints and ensuring that complaints are investigated in an evidence-based, fair, and efficient way."	The above-mentioned people, who are collectively responsible for delivering the council's complaints function, do so using the council's complaints policy, which standardises and sets the council's complaints process. They have access to officers at

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				all levels to enable them to do this.
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	<p>Section 16 of our policy says:</p> <p>“We are aware that learning from complaints can influence future service changes, policies, and procedures. We will look for systemic themes in complaints received and if found will use this awareness to learn and improve our service delivery.</p> <p>We will produce an annual complaints performance and service improvement report for scrutiny and challenge. This report will be considered annually by the Corporate Governance and Standards Committee and will be published on the complaints pages of our website”</p> <p>There is a dedicated Complaints Resolution Officer in the Housing Department who is experienced and trained to handle complaints effectively</p>	As set out in our complaints policy.

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
			and will identify learning from complaints	

## 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	Our complaints policy	We have a single complaints policy that covers complaints regarding the council's duties as a landlord (which are covered by the Housing Ombudsman Service's code) and our duties and responsibilities in other areas (which are covered by the Local Government and Social Care Ombudsman's code)
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	<p>Section 4 of our policy says:</p> <p>"There are certain subject areas that we would not review under the complaints process because there are alternative methods of reporting these issues. These subject areas include the following:</p> <ul style="list-style-type: none"> <li>• First time customers making a request for a service (such as removal of fly-tipping, missed</li> </ul>	<p>There is no stage 0 within our complaints policy.</p> <p>As set out in section 4 of our policy, where an issue has not been previously brought to our attention as a request, it would be dealt with through the appropriate channels, after which it would be treated as a stage 1 complaint.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			waste collection, reporting noise nuisance, or reporting a housing repair)."	
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	Section 8 of our policy sets out our process, which consists of two stages.	As set out in our complaints policy.
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		No aspect of our complaints policy is handled by a third party
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes		No aspect of our complaints policy is handled by a third party
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,	Yes	Section 8 of our policy says:  "A Stage 1 complaint will be logged, defined, and acknowledged within five working days of the complaint being received."	As set out in our complaints policy.



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	the resident must be asked for clarification.		“A Stage 2 complaint will be logged, defined, and acknowledged within five working days of the appeal request being received.”	
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	Section 8 of our policy says:  “A Stage 1 complaint will be logged, defined, and acknowledged within five working days of the complaint being received.” “A Stage 2 complaint will be logged, defined, and acknowledged within five working days of the appeal request being received.”	Where we are not responsible for any aspect of a complaint, we will clearly clarify this in our acknowledgement. If we are able to, we will signpost any elements we are not responsible for to the correct organisation.
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Yes	Section 8 of our policy says:  “At each stage of the complaints process, our complaint handlers will: <ul style="list-style-type: none"> <li>• Deal with complaints on their merits, act independently, and have an open mind.</li> <li>• Give the complainant a fair chance to set out their position.</li> </ul>	As set out in our complaints policy.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			<ul style="list-style-type: none"> <li>• Take measures to address any actual or perceived conflict of interest.</li> <li>• Consider all relevant information and evidence carefully.”</li> </ul>	
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	<p>Section 8 of our policy says:</p> <p>For Stage 1 complaints: “If responding within ten working days is not possible, an explanation will be given for the delay in providing the decision, and an expected date for when the Stage 1 outcome should be reached. This should not exceed a further ten working days without good reason and we will clearly explain the reason to you. When doing this, we will agree suitable intervals with you for keeping you informed about your complaint and will provide you with the contact details of the relevant Ombudsman.”</p> <p>For Stage 2 complaints: “The response to a Stage 2 complaint</p>	As set out in our complaints policy.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			will be sent within twenty working days of the complaint being acknowledged. If this is not possible, an explanation and an expected date by when the Stage 2 outcome should be reached will be provided. This should not exceed a further twenty working days without good reason and we will clearly explain this reason to the you. When doing this, we will agree suitable intervals with you for keeping you informed about your complaint and will provide you with the contact details of the relevant Ombudsman.”	
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	Section 15 of our policy says:  " We will comply with the Equality Act 2010, and where appropriate will make reasonable adjustments to our policy and procedure to accommodate an individual’s needs.”	Our complaints handling system allows us to record any reasonable adjustments and disclosed disabilities, ensuring this information is available to those investigating and processing the complaint.
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	Yes	Section 8 of our policy says:  “If all or part of the complaint is not resolved to your satisfaction	The content of section 2 of our policy aligns with section 2 of the Housing Ombudsman’s code. There

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.		<p>at Stage 1, you can request for it to be progressed to Stage 2 to be considered as an appeal. Stage 2 is our final response, and the appeal will not be considered by the same person that considered the complaint at Stage 1.”</p> <p>Furthermore, section 4 of our policy sets out the circumstances where we would not consider a complaint though our complaints procedure.</p>	are further exclusions included within this section that relate to the council’s duties as a local authority, as opposed to its duties as a landlord.
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	<p>Section 13 of our policy says:</p> <p>“We will log all complaints and their outcomes at each stage in our complaints handling system.”</p>	Our complaints handling system enables us to record all of the information required here.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the	Yes	<p>Section 10 of our policy says:</p> <p>“We will ensure that any remedy we offer at Stage 1 or Stage 2 reflects the extent of the service failures, and the level of</p>	As set out in our complaints policy.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	complaints process without the need for escalation.		detriment caused to the resident as a result.”	
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	<p>Section 19 of our policy says:</p> <p>“We are committed to dealing with all complaints received fairly and impartially, however, there will be circumstances where individuals hinder consideration of complaints and need to be managed differently. We have a separate policy for such matters, which can be found on our website.”</p> <p>Furthermore, our Vexatious, Malicious and Persistent Grievances Policy is available on the complaints pages of our website: <a href="#">What complaints do we deal with? - Guildford Borough Council</a></p>	As set out in our complaints policy and our Vexatious, Malicious and Persistent Grievances 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	<p>Our Vexatious, Malicious and Persistent Grievances Policy (<a href="#">available on our website</a>) says:</p> <p>“We will comply with the Equality Act 2010, and where required will adapt its policy and</p>	As set out in our complaints policy and our Vexatious, Malicious and Persistent Grievances Policy.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			<p>procedure to accommodate an individual's needs.</p> <p>Any restrictions imposed on a customer's contact should recognise and be appropriate to their individual circumstances."</p>	

**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	<p>Section 8 of our policy says:</p> <p>“With Stage 1 complaints, we will consider which complaints can be responded to as early as possible, and which require further investigation. In doing so, we will consider factors such as the complexity of the complaint and whether the complainant is vulnerable or at risk.”</p> <p>Section 2 of our policy says that one of the objectives of the policy is:</p> <p>“To resolve customer complaints at the earliest stage possible.”</p>	As set out in our complaints policy.
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	<p>Section 8 of our policy says:</p> <p>“A Stage 1 complaint will be logged, defined, and acknowledged within five working days of the complaint being received.”</p>	As set out in our complaints policy.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Section 8 of our policy says: “The response to a Stage 1 complaint will be sent within ten working days from complaint being acknowledged.”	As set out in our complaints policy.
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	Section 8 of our policy says:  “If responding within ten working days is not possible, an explanation will be given for the delay in providing the decision, and an expected date for when the Stage 1 outcome should be reached. This should not exceed a further ten working days without good reason and we will clearly explain the reason to you. When doing this, we will agree suitable intervals with you for keeping you informed about your complaint and will provide you with the contact details of the relevant Ombudsman.”	As set out in our complaints policy.
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	Section 8 of our policy says:  “If responding within ten working days is not possible, an explanation will be given for the delay in providing the decision,	As set out in our complaints policy.



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			<p>and an expected date for when the Stage 1 outcome should be reached. This should not exceed a further ten working days without good reason and we will clearly explain the reason to you. When doing this, we will agree suitable intervals with you for keeping you informed about your complaint and will provide you with the contact details of the relevant Ombudsman.”</p>	
6.6	<p>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.</p>	Yes	<p>Section 8 of our policy says:</p> <p>“With Stage 1 complaints, we will consider which complaints can be responded to as early as possible, and which require further investigation.”</p> <p>Section 10 of our policy says:</p> <p>“When offering a remedy, we will set out what will happen and timelines for this, in agreement with the complainant where appropriate. We will ensure that any remedy proposed is followed through to completion.”</p>	As set out in our complaints policy.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Section 9 of our policy says: "Complaint responses will 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."	As set out in our complaints policy.
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	<p>Section 3 of our policy defines what a complaint is whilst section 4 defines what is not a complaint.</p> <p>Section 8 of our policy says that: "A Stage 1 complaint will be logged, defined, and acknowledged within five working days of the complaint being received."</p>	<p>We will use the acknowledgement of a complaint to ensure our understanding of definition of the complaint matches that of the resident. Should this acknowledgement raise any further related issues following this, we will update our definition of the complaint to ensure effective response.</p> <p>Should further issues be raised following the stage 1 response, we would process these as we would any other complaint using the definitions set out in sections 3 and 4 of our policy.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	<p>Section 9 of our policy says:</p> <p>“In a complaint response, we will include the following in clear, plain language:</p> <ul style="list-style-type: none"> <li>• The complaint stage.</li> <li>• The complaint definition.</li> <li>• The decision on the complaint.</li> <li>• The reasons for any decisions made.</li> <li>• The details of any remedy offered to put things right.</li> <li>• Details of any outstanding actions.</li> <li>• <b>Stage 1:</b> details of how to escalate the matter to Stage 2 if the individual is not satisfied with the response.”</li> </ul>	As set out in our complaints policy.

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	Section 8 of our policy says: "If all or part of the complaint is not resolved to your satisfaction at Stage 1, you can request for it to be progressed to Stage 2 to be considered as an appeal. Stage 2 is our final response"	As set out in our complaints policy.
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	Section 8 of our policy says: "A Stage 2 complaint will be logged, defined, and acknowledged within five working days of the appeal request being received."	As set out in our complaints policy.
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	Section 8 of our policy says: "If all or part of the complaint is not resolved to your satisfaction at Stage 1, you can request for it to be progressed to Stage 2 to be considered as an appeal."  "A Stage 2 complaint will be logged, defined, and acknowledged within five working days of the appeal request being received."	Our complaints policy does not require the resident to explain their reasons for requesting a stage 2 appeal, and if we are not clear on the reasons why this request has been made, we will use the acknowledgement process to seek to clarify this.
6.13	The person considering the complaint at stage 2 must not be the same	Yes	Section 8 of our policy says:	As set out in our complaints policy.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	person that considered the complaint at stage 1.		“Stage 2 is our final response, and the appeal will not be considered by the same person that considered the complaint at Stage 1.”	
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	Section 8 of our policy says: “The response to a Stage 2 complaint will be sent within twenty working days of the complaint being acknowledged”	As set out in our complaints policy.
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	Section 8 of our policy says: “If this is not possible, an explanation and an expected date by when the Stage 2 outcome should be reached will be provided. This should not exceed a further twenty working days without good reason and we will clearly explain this reason to the you. When doing this, we will agree suitable intervals with you for keeping you informed about your complaint and will provide you with the contact details of the relevant Ombudsman.”	As set out in our complaints policy.
6.16	When an organisation informs a resident about an extension to these	Yes	Section 8 of our policy says:	As set out in our complaints policy.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	timescales, they must be provided with the contact details of the Ombudsman.		“If this is not possible, an explanation and an expected date by when the Stage 2 outcome should be reached will be provided. This should not exceed a further twenty working days without good reason and we will clearly explain this reason to the you. When doing this, we will agree suitable intervals with you for keeping you informed about your complaint and will provide you with the contact details of the relevant Ombudsman.”	
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	<p>Section 8 of our policy says:</p> <p>“With Stage 1 complaints, we will consider which complaints can be responded to as early as possible, and which require further investigation.”</p> <p>Section 10 of our policy says:</p> <p>“When offering a remedy, we will set out what will happen and timelines for this, in agreement with the complainant where appropriate. We will ensure that</p>	As set out in our complaints policy.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			any remedy proposed is followed through to completion.”	
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	Section 9 of our policy says: “Complaint responses will 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.”	As set out in our complaints policy.
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	Section 9 of our policy says:  “In a complaint response, we will include the following in clear, plain language: <ul style="list-style-type: none"> <li>• The complaint stage.</li> <li>• The complaint definition.</li> <li>• The decision on the complaint.</li> <li>• The reasons for any decisions made.</li> <li>• The details of any remedy offered to put things right.</li> <li>• Details of any outstanding actions.</li> <li>• <b>Stage 1:</b> details of how to escalate the matter to Stage 2 if the</li> </ul>	As set out in our complaints policy.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			individual is not satisfied with the response. <b>Stage 2:</b> details of how to escalate the matter to the relevant Ombudsman 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	Section 8 of our policy says: “Stage 2 is our final response”	As set out in our complaints policy.  The people mentioned in 4.1 above, who are collectively responsible for delivering the council’s complaints function, have access to officers at all levels to enable them to do deliver the council’s complaints function.



## 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> <li>• Changing policies, procedures or practices.</li> </ul>	Yes	<p>Section 10 of our policy says:</p> <p>“Remedies offered by us may include (but are not limited to) the following:</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 a 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> <li>• Changing policies, procedures, or practices.”</li> </ul>	As set out in our complaints policy.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>Section 10 of our policy says:</p> <p>“We will ensure that any remedy we offer at Stage 1 or Stage 2 reflects the extent of the service failures, and the level of</p>	As set out in our complaints policy.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			detriment caused to the resident as a result.”	
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	Section 10 of our policy says:  “When offering a remedy, we will set out what will happen and timelines for this, in agreement with the complainant where appropriate. We will ensure that any remedy proposed is followed through to completion.”	As set out in our complaints policy.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Section 10 of our policy says:  “We will also take account of guidance issued by the relevant Ombudsman when deciding on appropriate remedies.”	As set out in our complaints policy.

**Section 8: Putting things right**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> <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>	Yes	<p>Section 16 of our policy says:</p> <p>“We will produce an annual complaints performance and service improvement report for scrutiny and challenge. This report will be considered annually by the Corporate Governance and Standards Committee and will be published on the complaints pages of our website.”</p>	<p>As set out in our complaints policy; the annual report to Corporate Governance and Standards Committee will include all the information required by the code.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Section 16 of our policy says:  “This report will be considered annually by the Corporate Governance and Standards Committee and will be published on the complaints pages of our website. The response of the Corporate Governance and Standards Committee to the report will also be published alongside this.”	As set out in our complaints policy.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Section 16 of our policy says:  “We will also carry out a self-assessment following a significant restructure, merger and/or change in procedures, as well as if we are requested to review and update the self-assessment following an investigation by the relevant Ombudsman.”	As set out in our complaints policy.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Section 16 of our policy says:  “We will also carry out a self-assessment following a significant restructure, merger and/or change in procedures, as well as if we are requested to	As set out in our complaints policy.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			review and update the self-assessment following an investigation by the relevant Ombudsman.”	
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	Section 18 of our policy says:  “If we are unable to comply due to exceptional circumstances with this policy, or the Code of either Ombudsman, we will inform the relevant Ombudsman, provide information to residents who may be affected, and publish this on our website as soon as we can determine this within the scope of the issue.”	As set out in our complaints policy.  Should an exceptional circumstance, like a cyber incident, arise where we could not comply with the Code, as part of our wider response to the issue we would look to provide timescales to customers and residents on when are able to return to business as usual, including 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	<p>Section 2 of our policy says that one of the objectives of the policy is:</p> <p>“To ensure we learn from our mistakes to improve services where this is appropriate and to avoid repeat complaints”</p> <p>Section 16 of our policy says:</p> <p>“We are aware that learning from complaints can influence future service changes, policies, and procedures. We will look for systemic themes in complaints received and if found will use this awareness to learn and improve our service delivery.”</p>	As set out in our complaints policy.
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	<p>Section 2 of our policy says that one of the objectives of the policy is:</p> <p>“To promote accountability and transparency and an effective complaint handling culture.”</p>	As set out in our complaints policy.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			<p>Section 16 of our policy says:</p> <p>“We are aware that learning from complaints can influence future service changes, policies, and procedures. We will look for systemic themes in complaints received and if found will use this awareness to learn and improve our service delivery.”</p>	
9.3	<p>Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents’ panels, staff and relevant committees.</p>	Yes	<p>Section 16 of our policy says:</p> <p>“We will produce an annual complaints performance and service improvement report for scrutiny and challenge. This report will be considered annually by the Corporate Governance and Standards Committee and will be published on the complaints pages of our website.” We produce an annual housing complaints report which is shared with the management team and the Tenants Engagement Panel and published online.</p>	<p>As set out in our complaints policy.</p>
9.4	<p>Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person</p>	Yes	<p><a href="#">Executive Heads of Service for Community Wellbeing - Guildford Borough Council</a></p>	<p>The Assistant Director of Communications and Customer Services is</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.			accountable for complaint handling.
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	<a href="#">The Executive - Guildford Borough Council</a>	The Lead Member for Engagement and Customer Services is council's Member Responsible for Complaints.
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	Section 16 of our policy says:  "We will produce an annual complaints performance and service improvement report for scrutiny and challenge. This report will be considered annually by the Corporate Governance and Standards Committee and will be published on the complaints pages of our website. The response of the Corporate Governance and Standards Committee to the report will also be published alongside this."	As set out in our complaints policy.



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <p>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</p> <p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>	Yes		<p>The Assistant Director of Communications and Customer Services will keep the Lead Member for Engagement and Customer Services regularly appraised of complaints as part of their regular briefings, updates and discussions.</p>
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p>	Yes	<p>Section of our policy says:</p> <p>“our objective is for complaints to be handled in a way that reflects the need to:</p> <ul style="list-style-type: none"> <li>• Have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments.</li> </ul>	<p>As set out in our complaints policy.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	c. act within the professional standards for engaging with complaints as set by any relevant professional body.		<ul style="list-style-type: none"> <li>• Take collective responsibility for any shortfalls identified through complaints, rather than blaming others.</li> <li>• Act within the professional standards for engaging with complaints as set by any relevant professional body.”</li> </ul>	

<b>Purpose</b>	<b>DISCUSSION / INFORMATION</b>		
<b>Date</b>	April 2024	<b>Reference</b>	
<b>Appendices (1, 2, 3...)</b>	None	<b>Author</b>	Meena Lota
		<b>Contact</b>	Meena.lota@guildford.gov.uk
		<b>Links</b>	N/A

**Purpose of the report**

The purpose of this report is to provide the Management Team with an overview of the volumes and themes of complaints received within the Housing Department in 2023/24. In order to allow comparisons, the report also contains complaints data covering the previous financial year 2022/23.

**Introduction**

We are committed to providing an excellent service for our customers, but we know we don't always get it right and we recognise our customers have a right to complain when they feel we have fallen short. As well as giving us the chance to put things right, complaints give us valuable feedback on our services that help us improve.

The Council's corporate policy sets out a two-stage escalation process for corporate complaints, including timescales the council aims to adhere to when responding to complaints.

This report provides data on the volume and types of complaints recorded and our response timescales across a number of housing related services and includes: -

- Technical Services – Repairs and maintenance of Housing Revenue Account (HRA) properties
- Landlord Services – Management of tenancies within the HRA
- Housing Services – Allocations, homelessness and housing advice

Although categorised by Specialist Service, the complaint enquiry could equally relate to work that is undertaken with Customer and Case, finance or other services that support the overall provision of the service.

**Complaint volumes**

The table below shows complaint volumes by categories over the last two years.

Type	2022/23					2023/24				
	<u>Q1</u>	<u>Q2</u>	<u>Q3</u>	<u>Q4</u>	<u>Total</u>	<u>Q1</u>	<u>Q2</u>	<u>Q3</u>	<u>Q4</u>	<u>Total</u>
Service requests	4	6	10	5	25	1	4	1	0	6
Stage 1	17	31	43	50	141	60	66	64	56	246
Stage 2	1	0	0	2	3	4	1	10	5	20
MP/ME enquiries	2	28	46	46	122	22	14	47	53	136
Ombudsman Cases	1	0	0	0	1	0	0	2	0	2

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Analysing the above data, the total number of complaints has increased from 292 in 22/23 to 410 in 23/24.

Stage 1 complaints in 23/24 have increased by just over 78% (105) from the previous year. Stage 2 complaints have increased by over 500%, with the main increase being in quarter 3 of 23/24.

The increase in Stage 2 complaint volumes is expected. It is in-line with industry wide trends driven by the Housing Ombudsman Complaint Handling Code, which encourages sharing more frequent and transparent information with tenants around their rights to escalate complaints within process.

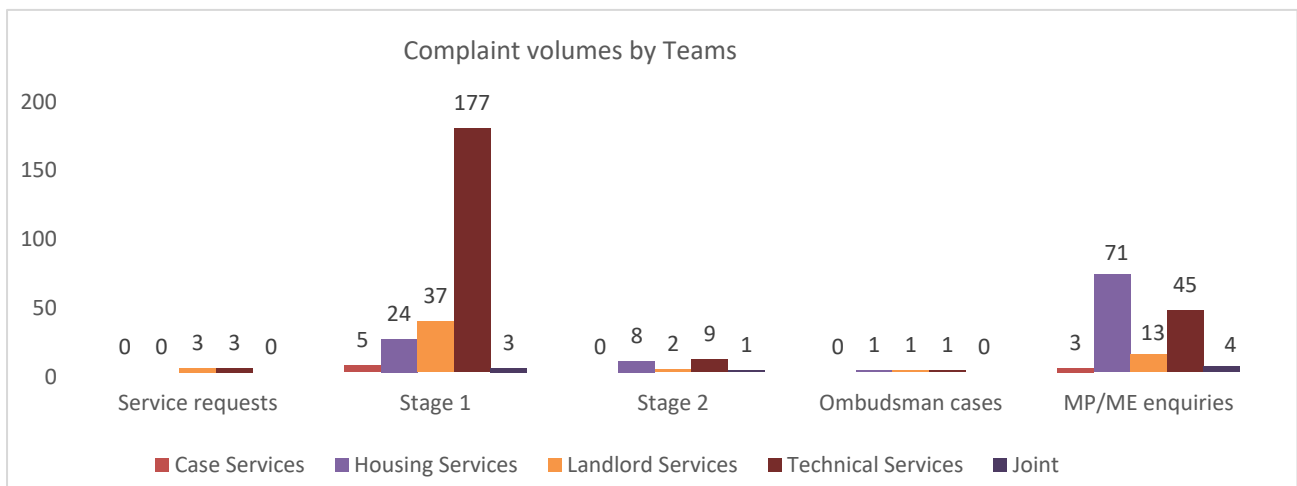
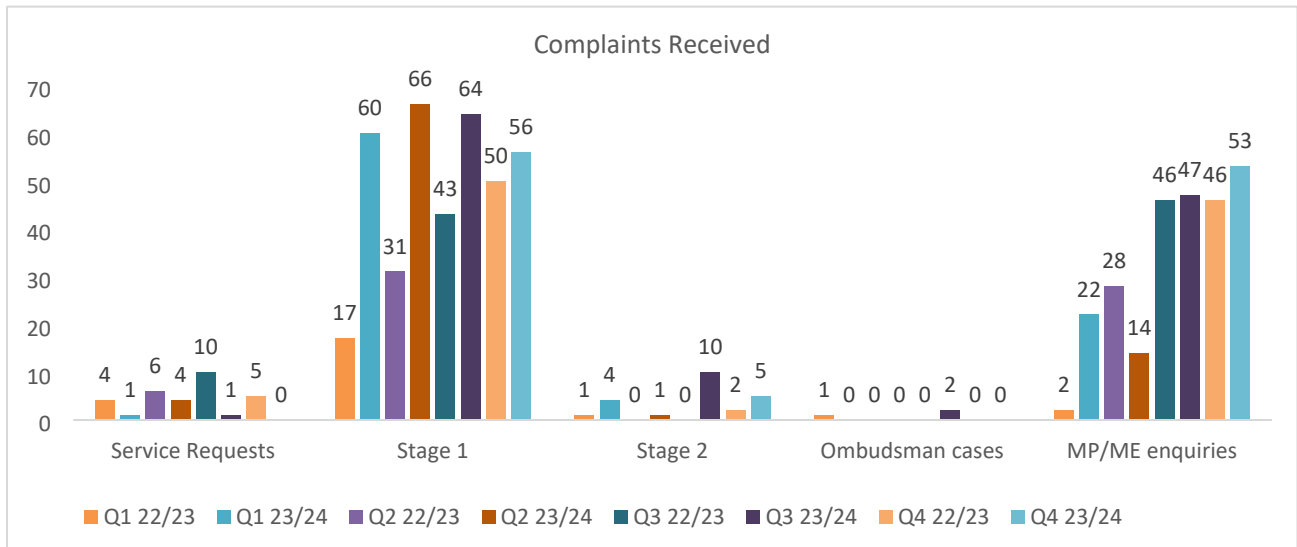
Tenants are advised at every stage of the process what their options are for escalation. To an extent, an increase in Stage 2 complaints is a healthy indicator that our process, and publicity around it, is allowing tenants to make informed decisions.

We have identified that a leading cause of Stage 2 escalations is failure to carry out works or actions promised at Stage 1. This trend is continuing, meaning we are driving these increased levels by failing to do what we have promised to do. From a service improvement point of view, it is strongly recommended that consideration must be given to upgrade the existing E-case system to allow for actions promised at Stage 1 and 2 to be logged, tracked and held accountable. The process currently in place has proven to be insufficient and action is needed to drive improvements and reduce Stage 2 escalations.

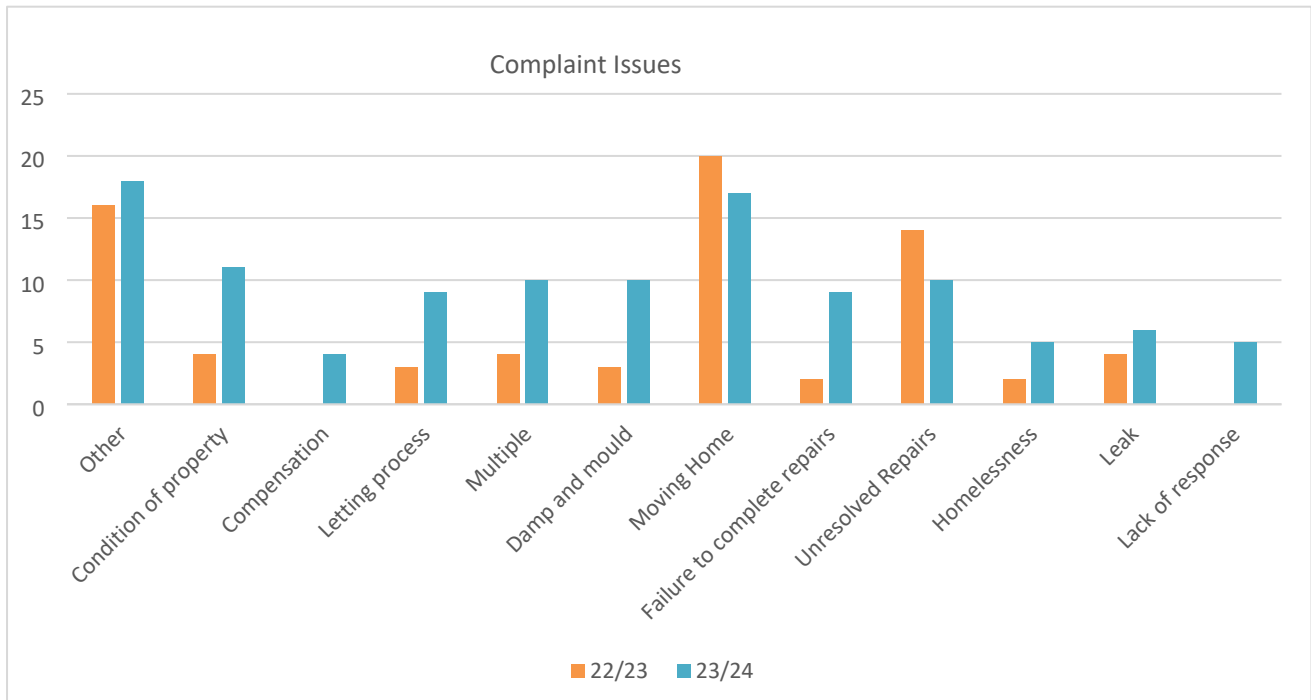
MP/ME enquiries have increased by 11.5% on 22/23 levels, mainly due to a spike in Q1 of 23/24.

The total number of service requests has dropped by 75%, down to a total of 6 across the year.

The charts below show the complaints received across all categories, volumes by teams and issues.



The majority of complaints at Stage 1 are for the Technical Services Team. Due to the recent challenges with the repairs service, this is unsurprising. Since the peak in Q2, the trend for Stage 1 complaints is downwards, which reflects the interim measures and tighter controls put in place. There is still likely to be a residual complaints hangover from the period in question.



In terms of issues, other than 'other', the most prevalent reason to complain is 'moving home'. The greatest increase has been seen with issues relating to damp and mould (230% increase) and failure to complete repairs (350% increase).

**Complaints responded to out of target**

Due to the challenges in the Technical Services Team, 90% of the complaints were responded out of target date. Many cases were responded to very late and would consequently skew the average time taken to respond to all complaints of the period.

**Ombudsman Complaints**

***Complaint Handling Code 2024***

The Complaint Handling Code will become statutory from 1 April 2024, meaning that landlords will be obliged by law to follow its requirements. The Code aims to achieve best practice in complaint handling and ultimately to provide a better service to residents. Key areas of the Code include:

- universal definition of a complaint
- providing easy access to the complaints procedure and ensuring residents are aware of it, including their right to access the Housing Ombudsman Service
- the structure of the complaint's procedure - only 2 stages necessary and clear times set out for responses
- ensuring fairness in complaint handling with a resident-focused process
- taking action to put things right and appropriate remedies
- creating a positive complaint handling culture through continuous learning and improvement
- demonstrating learning in annual reports

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- annual self-assessment against the Code

### ***New Code timescales for complaints***

Landlords have to provide a two-stage complaints process as part of the new Code.

A landlord must acknowledge a complaint at stage 1 of its process within 5 working days and supply a written response within 10 working days from the date of acknowledgment.

If the complainant is still dissatisfied after they have received a stage 1 response, they can request to progress the complaint to the final stage (stage 2). A landlord must acknowledge a stage 2 complaint within 5 working days and supply a written response within 20 working days.

### ***Complaint Handling Failure Order Report***

The Housing Ombudsman has released its latest Complaint Handling Failure Order report, sharing learning where it has seen poor complaint handling in the previous quarter.

There was a significant reduction in the number of orders issued in this quarter compared to the previous one, with 25 landlords that had an order in the last period not receiving any this time.

However, eight landlords did receive orders in both periods and the report includes case examples to support improvement, including compliance with the orders.

Ahead of the Complaint Handling Code becoming statutory on 1 April 2024, the ombudsman has shared key lessons from the past quarter – for example, on accepting complaints, agreeing extensions and providing evidence.

As of 1 April 2024, all landlords will have to adhere to the new provisions in the code. Whilst there are minimal changes for the landlords who are already compliant, the ombudsman is urging all landlords to review the new code in readiness and ensure self-assessments are submitted on time.

### **Learning from Complaints**

Complaints provide valuable feedback, and we encourage staff to view these as a positive opportunity to learn from experiences to drive continuous improvement and prevent similar issues happening again.

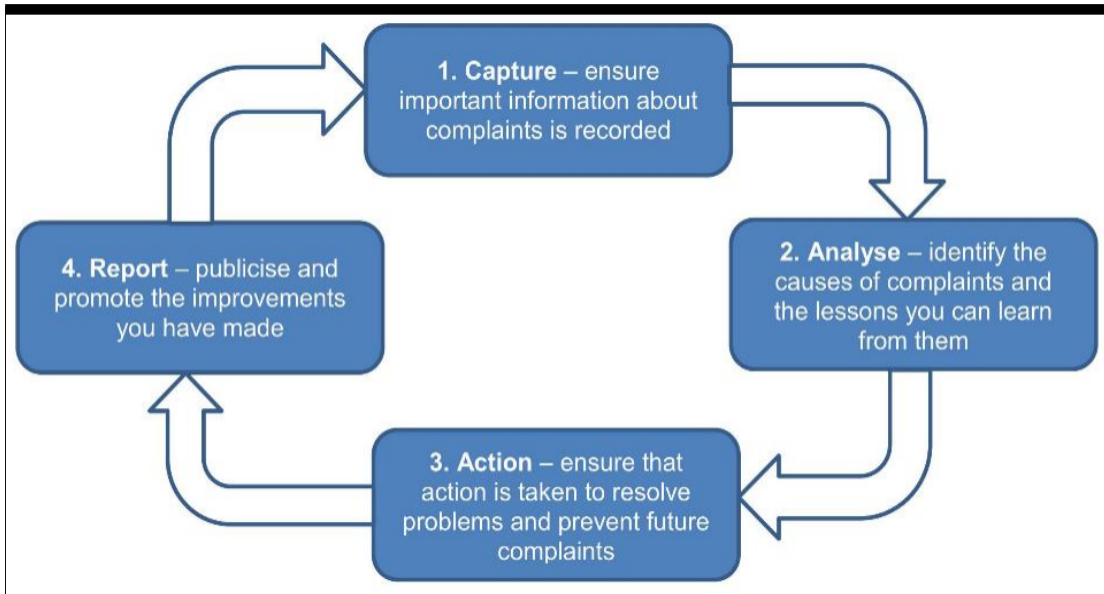
For staff, complaints provide a first-hand account of the customer's views and experience, and resolving complaints early saves resources and creates better customer relations.

The following learning was identified:

- Systems and record keeping have been identified as an area for improvement. Failings around service and complaint handling have often been where continuity of works, retrieval of records and work planning across several work streams have led to poor service delivery and customer service.
- Importance of communication and keeping tenants updated.
- Recommendations and agreed actions need to be tracked at stage 1 and stage 2 to ensure that we keep our promises to tenants and reduce the escalation rate.
- Ensuring that GBC policy and procedures are followed.

### **Service Improvements**

We acknowledge that complaints are a valuable source of information about our services which can help us to identify recurring or underlying problems and potential improvements. Coupled with the results of benchmarking exercises and our recently introduced satisfaction surveys, complaints can help to build up an accurate picture of how our services are performing and to develop improvement plans that are based on sound evidence. Having good data is imperative to this plan and following the process below, outlined by the Chartered Institute of Housing, we are focussed on learning the lessons from complaints over the last 18 months, which is an activity we have not been able to provide much resource to during the period.



We have identified a number of areas where we can make immediate improvement as we move into the new period:

- Complaints handling and communication - Complaint handling is a key area for improvement because most complaints over the period were responded to beyond the target date. A new resource is available within the Repairs team to investigate complaints.
- Management awareness – Managers have reported being unaware of complaints as they were not made aware of the complaint when it was received (mention work with loggers to action asap and cc managers and housing complaints, as well as setting up weekly reports to be sent from e-case)
- Tracking outstanding actions – a dedicated Complaints Tracker to be set up to monitor all complaints actions and sent weekly to managers to update and complete.
- Quality of data inputted – we need better oversight in terms of what is meant by ‘Other’ complaint issues so that we can capture the root cause of the complaint and look to identify trends.
- Policy and procedure - ensuring that GBC policy and procedures are followed.
- Systems and record keeping – this has been identified as an area for improvement. Failings around service and complaint handling have often been where continuity of works, retrieval of records and work planning across several work streams have led to poor service delivery and customer service.

**Actions for 2024/25**

## Agenda item number: 6

We have identified further work around learning from complaints to make sure we improve service delivery and prevent the same driver around complaints and dissatisfied customers being logged.

Implement tenant perception surveys to fulfil the Transparency, Influence and Accountability Standard - Tenant Satisfaction Measures. In addition, carry out complaints satisfaction surveys as feedback will allow us to ensure that we are dealing with complaints in a suitable manner. We want to learn from the feedback, work with teams to embed changes and a culture of continuous improvement.

Record complaint follow up actions on the complaints tracker and will only be removed or completed internally once all actions have been undertaken. This should result in a reduction in cases being escalated due to us not doing what we stated in our responses as part of the outcome for the customer.

Other improvements are around making sure contact is maintained throughout the complaint, including updating the customer when and why their complaint is going to be extended beyond the target date.

IT (E-case) system requires updating to encompass a single platform portal that has the capacity to include Stage 2 complaints, MP & Councillor enquiries and ongoing Ombudsman enquiries and investigations for greater transparency within the organisation.

Work with colleagues across the organisation to ensure we are compliant with the Housing Ombudsman Complaint Handling Code 2024.



**HOUSING OPERATIONS BOARD – FORWARD PLAN - DRAFT**

SUBJECT	DECISION TO BE TAKEN	KEY DECISION (YES/NO)	CONSULTATION (WHO)	RELEVANT DOCUMENTS	CONTACT OFFICER	TIMESCALE
<b>Governance</b>	<ul style="list-style-type: none"> <li>▪ Draw up Terms of Reference (ToRs)</li> <li>▪ Define clear roles, responsibilities and accountabilities of members</li> <li>▪ Appoint Chair, Secretary and members</li> <li>▪ Attendance tracking mechanisms and monitoring to drive representation in line with ToRs</li> <li>▪ Delegation arrangements, including retention of accountability</li> <li>▪ Procedures to escalate and remediate issues</li> <li>▪ Documentation standards including demonstrability of challenge and fulfilment of responsibilities</li> <li>▪ Consideration of specific regulatory requirements surrounding governance; independence, segregation of duties and conflicts management</li> </ul>					
Page 57 <b>HOB Meetings</b>	<ul style="list-style-type: none"> <li>▪ Frequency</li> <li>▪ How – online, face to face</li> <li>▪ Timing in the cycle</li> <li>▪ Venue</li> <li>▪ Minutes (who)</li> </ul>			ToRs		Quarterly
<b>Reporting - General</b>	<ul style="list-style-type: none"> <li>▪ What reports are required</li> <li>▪ Produce a template for all reports</li> <li>▪ Who is responsible for production of the reports</li> <li>▪ Who will collate and circulate the reports</li> </ul>					
<b>Reporting – Specific</b> (What teams will report on)	<b>Housing Repairs: (Ernie Gray)</b> <ul style="list-style-type: none"> <li>▪ Decent Homes Standard</li> <li>▪ 6 Areas of Health &amp; Safety (Exception reporting)</li> <li>▪ Capital Programme/Procurement Pipeline</li> <li>▪ HRA Business Plan</li> <li>▪ Legislative updates</li> <li>▪ Improvement Plan</li> <li>▪ Stock Condition Survey</li> <li>▪ Leaseholders:               <ul style="list-style-type: none"> <li>○ s.20</li> <li>○ service charges</li> <li>○ arrears</li> </ul> </li> </ul>					

	<p><b>Homelessness, Advice and Allocations:</b> (Siobhan Kennedy)</p> <ul style="list-style-type: none"> <li>▪ Homelessness plan</li> <li>▪ Rough sleepers</li> </ul> <p><b>Neighbourhood Housing:</b> (Siobhan Rumble)</p> <ul style="list-style-type: none"> <li>▪ Grounds Maintenance</li> <li>▪ Cleaning</li> <li>▪ ASB</li> <li>▪ Tenancy Audits</li> <li>▪ Tenancy Sustainment</li> <li>▪ Performance against Tenancy Standards</li> </ul> <p><b>Service Insight &amp; Improvement:</b> (Meena Lota)</p> <ul style="list-style-type: none"> <li>▪ KPIs</li> <li>▪ Complaints – lessons learned</li> <li>▪ Customer Satisfaction</li> <li>▪ Overall performance against Standards</li> </ul>					