

## **City of London Housing Service: Self-assessment form 2024**

The Housing Ombudsman requires that all social landlords assess their complaints handling policy and procedures annually against their Complaints Handling Code. This is to ensure that all landlords are compliant with the code and are following it in practice.

From 1<sup>st</sup> April 2024, the Complaints Handling Code became a statutory requirement. The Self-assessment provides information to stakeholders on how we are meeting the requirements of the Housing Ombudsman Code.

## Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <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>	Yes	<a href="#">Housing feedback and complaints - City of London</a>	The City of London Corporation, Housing Feedback and Complaints Service uses the Housing Ombudsman Service (HOS) definition of a complaint.  The City of London Corporation, Housing Service Division are members of the HOS and the Local Government & Social Care Ombudsman (LGSCO).
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	<a href="#">Housing Complaints Policy</a> Point 3. Definitions: and Point 7. Access  <a href="#">Third Party Authorisation Form – Appendix 1</a>	Where the subject of feedback amounts to a complaint, even if the resident has not stated that they wish to make a complaint, it is acknowledged and recorded as a complaint and investigated in accordance with the City of London Housing Complaints Policy, and how we define a complaint: 'A complaint is an expression of dissatisfaction...'  Third party correspondence is reviewed and considered for formal complaint investigation if the subject amounts to such. Third party authorisation is first put in place.
1.4	Landlords must recognise the difference between a service request and a complaint.	Yes	<a href="#">Housing feedback and complaints - City of London</a>	Service requests and reporting an issue for the first time, are referred to the appropriate service division to action

	<p>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.</p>			<p>and respond to the resident. Service requests are monitored and reviewed.</p> <p>Action taken is communicated to residents, with details of how to progress to a formal complaint.</p>
1.5	<p>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.</p>	Yes	<p><a href="#">Housing feedback and complaints - City of London</a></p>	<p>If a service request progresses to a formal complaint, the service request continues to be actioned, with the service division providing an estimated timeframe for the completion of the service request.</p> <p>Actions arising, or continuing, from a complaint investigation are tracked and monitored.</p>
1.6	<p>An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.</p>	Yes		<p>Any expression of dissatisfaction in response to a survey is flagged and referred to the relevant service areas to be picked up and actioned.</p> <p>Future surveys will have the capability to refer residents to the Housing Complaints Team for action.</p>

## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	<a href="#">Housing Complaints Policy</a> Point 4. Exclusions	If a request for a complaint is declined, we always contact the resident to explain our decision and detail what alternative action is being taken or is available to the. Correspondence with residents details the complaints process, how a complaint can be escalated and the contact details of the Housing Ombudsman Service
2.2	<p>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:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and</li> </ul>	Yes	<a href="#">The Feedback and Complaints webpage</a> Point 4: details acceptable exclusions.	<p>The Housing Complaints Policy currently states 6-months, however the Complaints Team accept complaints up to 12-months from the date of the issue. The Policy is currently being reviewed and will be updated to reflect this.</p> <p>From 1<sup>st</sup> April 2024, the Housing Complaints Team accept complaints 12-months from the date of the issue.</p>

	<p>Particulars of Claim, having been filed at court.</p> <ul style="list-style-type: none"> <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>	No		<p>The Complaints Policy currently states 6-months; however, we are accepting complaints from 12-months from the date of when the incident/issue occurred and apply discretion to complaint exceeding the 12-month period if the case warrants a formal investigation.</p> <p>The Housing Complaints Policy is currently being reviewed and will reflect the requirement in point 2.3 of the Code.</p> <p>From 1<sup>st</sup> April 2024, the Housing Complaints Team accept complaints 12-months from the date of the issue.</p>
2.4	<p>If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that</p>	Yes	<p><a href="#">Housing Complaints Policy</a> Point 4. Exclusions</p>	<p>If a request for a complaint is declined, we always contact the resident to explain our decision and detail what alternative action is being taken or is available to them. Correspondence with residents details the complaints process, how</p>

	the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.			<p>a complaint can be escalated and the contact details of the Housing Ombudsman Service.</p> <p>If the HOS determines that the exclusion was not fairly applied, we carry out a formal investigation in compliance with 2.4.</p>
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Exclusions are exceptional and require review by a senior manager before issued. We ensure that communications are maintained, and individuals are clear on alternatives solutions and sign-posted to appropriate services and agencies.	Each complaint received is taken on its' own merit. We ensure that a thorough investigation is carried out, ensuring that the resident in kept updated throughout, inspections are carried out and the circumstance of the complainant are taken into consideration.

### 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	<a href="#">Housing Complaints Policy</a> 7.1 Access  <a href="#">reasonable-adjustment-policy (cityoflondon.gov.uk)</a>	<p>We provide a broad access to the complaints service.</p> <p>Residents can submit a complaint or feedback via the webpage, by email to <a href="mailto:housing.complaints@cityoflondon.gov.uk">housing.complaints@cityoflondon.gov.uk</a>, by phone or letter. The Housing Complaints Team offer meetings and visit to estates for complainants that may be vulnerable or are unable to submit a complaint using other methods. The team attend regular estate drop-ins where the complaints service is promoted, and complaints can be made direct to an officer.</p> <p>The Equalities Act 2010 is considered, and we ensure that reasonable adjustments are considered and applied to enable all residents access to the complaint's services.</p>
3.2	Residents must be able to raise their complaints in any way and with any	Yes		Staff have received training on the complaints process and are aware of what is required. Staff take information

	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.			of residents' complaints and forward the details to the to the Housing Complaints Team. The Housing Complaints Team in turn, contact the resident to take a full account of the issues experienced and will then formally acknowledge the complaint and allocate for investigation.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	<a href="#">Housing Complaints Policy</a> 7.1 Access (refer to 3.1 above)	We publish articles on how to access the complaints service in the 6-monthly resident Magazine and monthly newsletters. Posters advertising the services are available in Estate Offices. Link in mag, newsletter and Annual Report
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	<a href="#">Housing feedback and complaints - City of London</a> <a href="#">housing-complaints-policy-v3 (cityoflondon.gov.uk)</a>	The COL Housing Complaints Policy is clear and accessible. It is available on on the Complaints and Feedback webpage, the City of London Democracy Webpage and via the Complaints Team, Estate Office. We also provide a Complaints Leaflet in hard copy format.
3.5	The policy must explain how the landlord will publicise details of the	No		This information is not currently included in the Housing Complaints Policy. This is currently under review, and the City of



	complaints policy, including information about the Ombudsman and this Code.			London aim to be compliant with point 3.5 by the end of July 2024.
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		<p>We ensure that residents are aware that they can be supported by third parties, advocates and representatives in dealing with their complaint. We request that a third-party authorisation form is completed prior to sharing any personal information regarding the complainant. Any third-party acting for, or supporting a resident in making a complaint, is included in all communication, and invited to meetings.</p> <p>To be included in the Policy review, July 2024.</p>
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	<a href="#">Housing feedback and complaints - City of London</a>	Information on how to access the Housing Ombudsman Service is also included in all correspondence and at all stages of a complaint.

## Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	<p><b>Complaints Officer (lead):</b>  <b>Information, Quality Assurance &amp; Performance Manager</b>  <b>Housing Complaints Team</b></p> <hr/> <p><b>Department of Community &amp; Children's Services</b>  City of London  020 7606 3030  <a href="mailto:Housing.complaints@cityoflondon.gov.uk">Housing.complaints@cityoflondon.gov.uk</a>  <a href="#">Housing feedback and complaints - City of London</a>  <a href="http://www.cityoflondon.gov.uk">www.cityoflondon.gov.uk</a></p>	There is an appointed Complaints Officer who is responsible for complaint handling, including liaising with the HOS and providing information to report to the governing body. The Housing Complaints Team coordinate the handling of all complaints (Resident and HOS) and provides data for reporting to governing body.
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		The Complaints Officer has access to staff at all levels and ensures that issues are internally escalated to agree prompt resolution to cases where it is required.
4.3		Yes	Training & awareness messaging	Weekly complaints meetings take place. Regular training is carried out. Access to

	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			<p>guidance for staff to access which details HOS requirements in complaints handling, along with e-learning and case studies.</p> <p>HOS e-learning shared with complaint handlers.</p> <p>HOS Handling Code is referenced in complaints communications with staff.</p>
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## Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	<a href="#">Housing Complaints Policy</a> Point 1. Purpose and Scope Point 7. Our approach to complaints.	<p>There is a single policy in place, which is currently under review to ensure compliance with full HOS code.</p> <p>Residents' complaints are an opportunity for us to improve our services. We treat residents fairly and equally in dealing with their complaints.</p>
5.2		Yes	<a href="#">Housing Complaints Policy</a> Point 3.3. Definition	Officers are still referring to issues outside of the formal complaint stage as

	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.			'informal', however continued training is provided to ensure that staff understand the requirements under point 5.2.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	<a href="https://www.cityoflondon.gov.uk/what-we-do/our-services/housing-complaints-policy">housing-complaints-policy-v3 (cityoflondon.gov.uk)</a>	
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	This is carried out in practice; however, it is not currently clear in the policy.	The Housing Complaints Policy was reviewed in September 2021 where a two-stage process was agreed and implemented.  Point 5.4 will be referenced in the reviewed Policy July 2024
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	This is adhered to in practice.	Third parties work within the Housing Complaints policy which lays out the HOS Complaint Handling Code expectations.

				5.5 to be referenced in review of Policy, July 2024.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	<a href="#">Stage One Response Template – Appendix 2</a>	This is carried out. Complaints are summarised in acknowledgement and further information is sought to clarify the complaint and the requested outcome, if this isn't clear.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes		It is clearly stated in acknowledgements and complaints correspondence, what areas of the complaint are relevant for investigation under the Housing Complaints policy.  For areas of a complaint that falls outside of the Housing Complaints remit, residents are sign-posted to other processes, departments and services.
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;	Yes	<a href="#">Investigation Guidance template 2024.docx</a>	The Complaint Handler (Investigating Officer) is expected to investigate a complaint impartially, independently, and confidentially (where possible). Guidance and advice are available from the City of London Housing Complaints team and on

	<ul style="list-style-type: none"> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>			<p>the complaints handling SharePoint site. This includes guidance on investigations, what to consider when carrying out an investigation, and how to communicate best practice. Training and briefings are delivered by the housing complaints team as required.</p>
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		Residents are contacted in advance of the deadline, to update them on the investigation progress and to set a new date for the response, when the original deadline cannot be met.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	<a href="http://reasonable-adjustment-policy.cityoflondon.gov.uk">reasonable-adjustment-policy (cityoflondon.gov.uk)</a>	In accordance with the Equality Act 2010, reasonable adjustments are considered for all residents, and carried out where appropriate.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly	Yes	<a href="#">Housing Complaints Policy</a> , Refer to Point 7.3	We rarely refuse to escalate a complaint. Where complaints are not escalated, valid reasons are provided in line with the Complaints Policy and HOS Complaints Handling Code.

	set out these reasons, and they must comply with the provisions set out in section 2 of this Code.			
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		Secured records are kept for each individual complaint, comprising the relevant complaint correspondence.  A folder is set up for each complaint and staff are required to ensure that all relevant supporting investigation information, including surveys and reports, are saved in this location.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	<a href="https://www.cityoflondon.gov.uk/what-we-do/our-services/housing-repairs/housing-complaints-policy-v3">housing-complaints-policy-v3 (cityoflondon.gov.uk)</a>	Staff are made aware that remedying a complaint should not be delayed and to seek early resolution where it can be achieved.
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	Yes	<a href="https://www.cityoflondon.gov.uk/what-we-do/our-services/housing-repairs/unreasonable-behaviour-policy">unreasonable-behaviour-policy (cityoflondon.gov.uk)</a>  Training on policy and process.	A set criterion must be evidenced prior to any communication sanctions being implemented; this is in accordance with the Unreasonable Behaviour Policy. Any sanctions must be authorised by the Assistant Director.

	must keep restrictions under regular review.			
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	<a href="#">Housing Complaints Policy</a> Point 7.1. Access <a href="#">unreasonable-behaviour-policy (cityoflondon.gov.uk)</a>	Consideration of individual needs and any vulnerability is given for each case. And where it is deemed appropriate, a single point of contact is put in place.  There is a right of appeal.

## 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	Each complaint is reviewed to determine if early resolution and response is possible,	Information is available on the Housing System (Civica) regarding vulnerabilities of residents that we are aware of. The Complaints team liaise with Service Managers to identify if the complaint can be resolved in a short timescale bearing in mind any vulnerability that the resident may have and so the Housing Complaint's Team can update the resident.



				Information will be updated in the Housing Complaints Policy (July 2024)
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	All complaints are acknowledged within five working days once received within the Housing Division.	There is an auto-response set up on the on the email account, notifying complainants that their communication has been received and is under review, and that complaints will be formally acknowledged within 5-working days.
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	<a href="#">Housing feedback and complaints - City of London</a>	The set timeframe to respond to Stage One Complaints is 10 working days, and is set out in the <a href="#">Housing Complaints Policy</a> and the Feedback and Complaints Webpage.
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		<p>The Housing Complaints Team liaise with investigating officers to discuss the complexity of the complaint and the time needed to conclude a thorough investigation.</p> <p>Residents are contacted in advance of the original deadline, to inform them of any additional time needed beyond the set ten days timeframe.</p> <p>If the complaint cannot be responded to without good reason (within the extension</p>

				period), the matter is referred to the Head of Service.
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		Template forms and all complaints correspondence with residents regarding extensions to timescales, informs residents that they can contact the HOS at any stage of a complain, along with the details on how to do so, with links to the HOS.
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes		Staff are reminded that complaint responses should not be withheld whilst waiting for actions to be completed.  Actions arising from investigations are tracked and monitored.
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	<a href="#">Investigation Guidance template 2024.docx</a>	The investigation guidance document includes the complaint definition, and all points in the complaints are noted in the guidance to ensure that it is fully investigated and responded to.  Clear reasons for all decisions in the complaint outcome are supported by referencing relevant policy, good practice, and Housing Law where appropriate.

6.8	<p>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.</p>	Yes		<p>When additional information is received from a resident about a complaint, which is related to the original complaint, the information is incorporate into the investigation guidance for the investigating officer.</p> <p>If the Complaint is already allocated for investigation, the resident is made aware that response timeframes could be affected.</p> <p>If the additional information is a separate matter, a new complaint is logged and acknowledged at Stage 1.</p>
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ol 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> </ol>	Yes	<p><a href="#"><u>Housing Complaint Investigation Guidance Template – Appendix 3</u></a></p> <p><a href="#"><u>Stage One Response Template – Appendix 2</u></a></p>	<p>The information required in the response is detailed in the investigation guidance document and the template response for Stage 1 and 2, which are provided to investigating officers.</p>

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

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	<a href="#">Housing Complaints Policy</a> <a href="#">Housing feedback and complaints</a> - <a href="#">City of London</a>	Residents are informed on how to escalate their complaint. Escalated complaints are accepted unless there is clear evidence that the complaint doesn't warrant escalation, in accordance with policy and the code.  This is detailed in Stage 1 complaint response and also in the Complaints Policy and Website.
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		Complaints escalated to Stage Two are acknowledged within five working days of receipt within the Housing Division.

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		<p>When the reason for escalation is not clear, the Housing Complaints Team will seek clarification from the resident.</p> <p>We currently request that resident detail why they remain dissatisfied, when submitting a complaint escalation to Stage 2. This enables to understand the remit of the remit and scope of the escalated complaint.</p>
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes		Investigations at Stage Two are carried out by a Head of Service, different to the investigating officer at Stage One.
6.14	Landlords must issue a final response to the stage 2 <b>within 20 working days</b> of the complaint being acknowledged.	Yes	<a href="#">Housing Complaints Policy</a> Point 5. Service Standards	The timeframe for responding at Stage 2 is 20 working days.
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	Yes		Housing Complaints Team liaise with investigation officers to discuss the complexity and the time needed to conclude a thorough investigation. Residents are contacted to inform them of any additional time needed beyond the

	the reason(s) must be clearly explained to the resident.			set twenty-day timeframe and the reason for the delay in providing a final response.
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6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes		All communication templates and complaint email correspondence inform resident that they can contact the HOS at any stage of a complain, along with the details on how to do so, with links to the HOS.
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>Staff are reminded that complaint responses should not be withheld whilst waiting for actions to be completed.</p> <p>Actions arising from investigations are tracked and monitored at weekly complaints meetings</p>
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	<a href="#">Investigation Guidance template 2024.docx</a>	<p>Investigation guidance document used to ensure complaint handlers respond to all points of the complaint definition.</p> <p>We refer residents to our policies and service standards (response times) and Housing law where applicable.</p>
6.19		Yes	<a href="#">Stage Two Response Template – Appendix 4</a>	This information is provided in the within the stage 2 complaint response template.

	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 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 the Ombudsman Service if the individual remains dissatisfied.</li> </ul>			
6.20	<p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>	Yes		<p>S2 Investigating officers meeting the Investigating Officer at S1 and all other parties related to the issues raised in the complaint. Complaint responses are reviewed before the response is sent.</p>

## 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><a href="#"><u>Stage One Response Template – Appendix 2</u></a></p> <p><a href="#"><u>Stage Two Response Template – Appendix 4</u></a></p> <p><a href="#"><u>Compensation Policy</u></a></p>	<p>All aspects of 7.1 are considered in addressing service failure and to remedy issues where it is needed.</p> <p>Complaints Polices will reflect these changes in July 2024.</p> <p>Compensation Polices will reflect these changes in October 2024</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.		<p><a href="#"><u>Compensation policy</u></a></p> <p><a href="#"><u>Compensation Approval Form – Appendix 5</u></a></p> <p><a href="#"><u>Compensation Acceptance Form – Appendix 6</u></a></p>	

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	Weekly complaints meeting is held - actions are tracked and monitored.  <a href="#">Complaints Meeting Agenda Template – Appendix 7</a>	Tracked and monitored Weekly complaints meeting Individual meetings with complaint handlers.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes		The HOS Guidance is referred to, so we can ensure that appropriate remedies are provided.

## Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a) the annual self-assessment against this Code to ensure their	Yes	<a href="#">annual-complaints-report-23-24 (cityoflondon.gov.uk)</a>	See attached

	<p>complaint handling policy remains in line with its requirements.</p> <p>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;</p> <p>c) any findings of non-compliance with this Code by the Ombudsman;</p> <p>d) the service improvements made as a result of the learning from complaints;</p> <p>e) any annual report about the landlord's performance from the Ombudsman; and</p> <p>f) any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>			
8.2	<p>The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's</p>	Yes		<p>To be submitted Community &amp; Childrens Services Committee in July 2024</p>

	response to the report must be published alongside this.			
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Not required to date	To be included in Policy (July 2024)
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Not required to date	To be included in Policy (July 2024)
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	Not required to date	To be included in Policy (July 2024)

## 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	Complaints Learning Panel – bi-monthly	Complaints are reviewed to identifying learning, communication, support needs and service improvements. We also aim to reduce the risk of future service failures
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	<a href="#">Housing feedback and complaints - City of London</a> <a href="#">Housing Service Standards - City of London</a>	We are instituting changes to promote a positive complaint handling culture, we consider this work to be an ongoing process  We seek to improve service delivery at point of contact to reduce cause for complaint. Eleven service standards have been introduced to ensure all staff and resident are aware of expectations
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	<a href="#">Housing feedback and complaints - City of London</a>	Report to committee in July 2024 detailing the regularity of complaint reporting on a quarterly basis.

9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes		Senior Lead: Assistant Director, Housing
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		Member Responsible for Complaints (MRC): Chair of Housing and Almshouses sub-committee.
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	MRC (members) have access to officers.	Complaints update reports will be sent to each Housing and Almshouses sub-committee
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:	Yes	Complaints update reports will be sent to each Housing and Almshouses sub-committee	Committee reports will <ul style="list-style-type: none"> <li>• provide information on the number, category and outcome of complaints</li> </ul>

	<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>			<p>alongside key performance indicators</p> <ul style="list-style-type: none"> <li>• informs the committee in relation to trends and current issues, and the organisational learning from complaints (including any changes to processes or procedures made as a result of complaints)</li> <li>• Give detailed information on complaints in relation to service failures (where appropriate) and actions being taken to resolve issues and to prevent re-occurrence</li> </ul>
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> <p>c) act within the professional standards for engaging with</p>	Yes		<p>The key objectives of fairness, putting things right and learning from outcomes are promoted at weekly compliant meetings and Senior Management meetings.</p>

	complaints as set by any relevant professional body.			
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## Appendix 1 - Third Party Authorisation Form

### Department of Community and Children's Services

Judith Finlay

Director of Community and Children's Services



## Third Party Authorisation

Giving a named individual permission to receive information about the authorising party.

### Your name and contact information (Resident)

Name	
Address	
Email	
Tel no.	

### Name of the person you're giving permission to request and receive Information about you (Third Party)

Name	
Company/Organisation	
Position	
Email	
Tel. no	

I give permission for the above named third party to request and receive information regarding. I understand this could include personal and sensitive information about me.

**Signature:** .....

**Date:** .....

If at any time you no longer wish to share your information with the third party, please contact your Estate Team. Please refer to the Information Commissioners Officer details on your information rights.

[www.ico.org.uk](http://www.ico.org.uk)

## Appendix 2 - Stage One Complaint Response Template

### Department of Community and Children's Services

Judith Finlay

Executive Director of Community and Children's Services



**[NAME]**

**[ADDRESS]**

Email [housing.complaints@cityoflondon.gov.uk](mailto:housing.complaints@cityoflondon.gov.uk)

Date [DATE]

Dear **[NAME]**

### Stage One Complaint Response – [USE COMPLAINT SUBJECT HEADER]

Thank you for your **[email/call/letter]** of **[date]**, informing us of your complaint. I am sorry for any **inconvenience/distress** that you have been caused.

**[Add summary of the complaint] Your complaint was as follows..... (can be in bullets or written paragraphs)**

I have investigated your complaint at stage one of the Housing Complaints procedure. In carrying out my investigation, I have **[interviewed/spoken to, reviewed, considered, requested statements etc..... delete as appropriate]**. I have also taken account of your further communications dated [ .... ] relating to the same complaint. **[Delete as appropriate]**.

### **ACTIONS**

**What Actions have been taken to put this right?**

**What Actions are ongoing or outstanding?**

**When do you anticipate completion? Use dates/timeframes. Provide dates on when you will give further updates as agreed with the resident. [this information can be presented in tables/bullet points.]**

### **INVESTIGATION OUTCOME**

**[Include the points that the complainant has raised, and the investigation outcome of each point].**

To conclude, I [**uphold/do not uphold/partially uphold**] your complaint [**GIVE A BRIEF SUMMARY OF REASONS / FURTHER ACTION THAT IS BEING TAKEN**]

This letter concludes Stage One of the formal Housing Complaints procedures. If you are dissatisfied with the way your complaint has been dealt with, you have the right to escalate it to Stage Two of the Housing Complaints procedures. To do this you will need to contact the Housing Complaints team [housing.complaints@cityoflondon.gov.uk](mailto:housing.complaints@cityoflondon.gov.uk) within 30 days of receiving this letter, clearly detailing the reasons why you feel that your complaint has not been satisfactorily dealt with at stage one of the process.

Residents can contact the [Housing Ombudsman Service](#) at any stage of a complaint. You can do so by visiting the Housing Ombudsman Service website by clicking the link above. Alternatively, you can contact them by email: [info@housing-ombudsman.org.uk](mailto:info@housing-ombudsman.org.uk), by phone: 0300 111 3000, or you can write to them at the following address:

**Housing Ombudsman Service  
PO Box 152  
Liverpool  
L33 7WQ**

Yours sincerely,

**Complaint investigator Sign-off**

**Making a Complaint**

[cityoflondon.gov.uk/services/housing/housing-services/housing-feedback-and-complaints](https://cityoflondon.gov.uk/services/housing/housing-services/housing-feedback-and-complaints)  
[Housing.complaints@cityoflondon.gov.uk](mailto:Housing.complaints@cityoflondon.gov.uk)

## Housing Complaint - Investigation Guidance

Complaint Stage	
Name & Address and contact number/email:	
Date of Complaint	
Date of Acknowledgement	
Deadline	
Investigating Officer	

*This table is to be used alongside the original complaint and other relevant communications regarding this matter. If additional information is required from the complainant, please request it ensuring that Housing Complaints is copied in.*

*If you anticipate that the investigation will go beyond the 10-day turnaround (stage 1) or 20-day turnaround (stage 2), please inform Housing Complaints at the earliest possible convenience so we can make the complainant aware of this in advance.*

*This guidance has been set in accordance with the Housing Ombudsman Service (HOS) Complaints Handling Code:*

The response must include the following:	Quality points to consider in your written response.
<ul style="list-style-type: none"> <li>• Date of Complaint</li> <li>• Stage</li> <li>• Definition and summary of complaint (what the complaint is)</li> <li>• Outcome of investigation and reasons for decision</li> <li>• What have we done to put this right?</li> <li>• What are the outstanding actions (estimate timeframe – agree updates to resident)</li> <li>• Detail escalation process.</li> <li>• Housing Ombudsman details</li> </ul>	<ul style="list-style-type: none"> <li>• Use the active voice and strong verbs.</li> <li>• Empathise and apologise well (be clear on what it is you are apologising for)</li> <li>• Write shorter sentences that deliver more.</li> <li>• Get rid of waffle and jargon, including acronyms and abbreviations and technical terms.</li> <li>• Develop a letter structure that will work for the complainant e.g., you may consider mirroring the style used in the complainant's correspondence, and bullet points to identify the individual points being responded to</li> <li>• Ensure that all points in the complaint are addressed in your response and the response is structured as advised.</li> <li>• Check the names and addresses are correct.</li> <li>• Check spelling and punctuation.</li> </ul>

# Housing Complaint - Investigation Guidance

Complaint Definition (what the complaint is about)	Investigation Notes for Response

Outcome sought	Actions Taken / Ongoing Actions / Compensation Awarded

## Appendix 4 - Stage Two Complaint Response Template

### Department of Community and Children's Services

Judith Finlay

Executive Director of Community and Children's Services



[NAME]

[ADDRESS]

Email [housing.complaints@cityoflondon.gov.uk](mailto:housing.complaints@cityoflondon.gov.uk)

Date [DATE]

Dear [NAME]

### Stage Two Complaint Response – [USE COMPLAINT SUBJECT HEADER]

Thank you for your [email/call/letter] of [date], informing us of your request to escalate your complaint to stage two of the Housing Complaints process. **[I have considered the further information that you have submitted.....DELETE AS APPROPRIATE]**

I have investigated your complaint at stage two of the Housing Complaints procedure, which involves a review of the outcome of the Stage one investigation. investigated at stage one.

#### COMPLAINT AND INVESTIGATION FINDINGS:

In carrying out my investigation, I have [considered, requested statements etc..... delete as appropriate]. I have also taken account of your further communications dated [ ....] relating to the same complaint. [Delete as appropriate].

To conclude, I [uphold/do not uphold/partially uphold] your complaint **[GIVE A BRIEF SUMMARY OF REASONS / FURTHER ACTION THAT IS BEING TAKEN]**

#### INVESTIGATION OUTCOME

**[Include the points that the complainant has raised, and the investigation outcome of each point].**

This letter concludes stage two of the formal Housing Complaints procedures. If you are dissatisfied with the way your complaint has been dealt with, you can contact the Housing Ombudsman Service at the following link. Alternatively, you can contact them by email:

[info@housing-ombudsman.org.uk](mailto:info@housing-ombudsman.org.uk), by phone: 0300 111 3000, or you can write to them at the following address:

**Housing Ombudsman Service**  
**PO Box 152**  
**Liverpool**  
**L33 7WQ**

Residents can contact the [Housing Ombudsman Service](#) at any stage of a complaint.

Yours sincerely,

**Complaint investigator Sign-off**

**Making a Complaint**

[www.cityoflondon.gov.uk/services/housing/making-a-complaint](http://www.cityoflondon.gov.uk/services/housing/making-a-complaint)

[Housing.complaints@cityoflondon.gov.uk](mailto:Housing.complaints@cityoflondon.gov.uk)



**Department of Community & Children's Services**

**Housing Services – Compensation Form**

Refer to the [Compensation Policy](#) and the Repairs & Maintenance [Service Standards](#) to assist in completing this form.

**Provide background and summarise the claim:**

--

**Factors to be taken into account when considering making a compensation payment.**

<p><b>Money not paid:</b> <i>Where the resident can evidence incurred costs which would not have been necessary but for the service failure, reimbursement of those costs may be appropriate. The exception to this is where the resident incurs costs unreasonably</i></p>	
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<p><b>Quantifiable costs:</b> <i>where the resident can evidence incurred costs which would not have been necessary but for the service failure, reimbursement of those costs may be appropriate. The exception to this is where the resident incurs costs unreasonably.</i></p>	
<p><b>Loss of non-monetary benefit:</b> <i>the resident may have been deprived of a non-monetary benefit, such as a service or amenity which under normal circumstances they would have received. And attempt should be made to quantify the last such benefits, to determine the amount of compensation due. It may be possible to basis on what it would have cost the City of London corporation to make the appropriate provision for the relevant. Or what would value or what value may be put on the facility.</i></p>	
<p><b>Loss of value:</b> <i>something owned by the resident has lost value as a result of the department sanctions, and objective assessment of the loss may be possible the matter may be referred for assessment where appropriate by an independent valuer.</i></p>	
<p><b>Maladministration:</b> <i>maladministration is usually considered to be a fault with the way something is being done or not done, rather than a decision or outcome. He may occur where an organisation is failed to act reasonably in accordance with the law his own policies and generally accepted standards.</i></p>	
<p><b>Distress &amp; Inconvenience:</b> <i>in exceptional circumstances, compensation may be considered for distress or inconvenience. All the relevant circumstances will be considered, including the severity of the inconvenience, the length of time involved and the number of people affected.</i></p>	

**Offers of compensation will be made in writing and expressed to be ‘in full and final settlement’ of the complaint.**

Amount of compensation being offered:	
Officer requesting the compensation payment:	
Authorising Manager:	
Date:	



**Compensation Acceptance Form**

**Name:**

**Address:**

I hereby accept the offer of compensation of £

**Service Failure Identified:**

*(Please provide a copy of a bank/building society statement with your account details in order for this to be processed)*

Signed: \_\_\_\_\_

Dated: \_\_\_\_\_

*(please return the completed form to [housing.complaints@cityoflondon.gov.uk](mailto:housing.complaints@cityoflondon.gov.uk))*



## Weekly Complaints Meeting

Property Services – Housing & Barbican

[DATE]

[Click here to join the meeting](#)

## Agenda

To monitor actions arising from complaint investigation using the [Tracker](#). Review of current complaints and investigation concerns.

Attendees:

Optional:

### 1. Review Tracker – focussing on the oldest complaint with actions remaining open

#### Wates

Property	Outstanding Action

#### TSG

Property	Outstanding Action

#### Property Services Team

Property	Outstanding Action

#### Barbican

Property	Outstanding Action

**2. Current Complaint Investigations and any concerns (delays etc)**

Property Services – Housing

Property	Complaint

Property Services - Barbican

Property	Complaint

**3. Team updates**

**4. AOB**