



**COUNCIL HOUSING  
COMPLAINTS POLICY**

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**Links to Council Corporate Plan 2025-28**

Council ambition	Linked?
<b>Working for a prosperous future</b> <i>To ensure the best possible local economy, with opportunities for the Council's tenants to succeed and achieve.</i>	Yes/No
<b>Healthier, safer communities</b> <i>Tenants should feel safe in the Borough and supported to be more active in order to improve their health and wellbeing.</i>	Yes/No
<b>A greener and cleaner environment</b> <i>It's important to everyone that we look after the environment.</i>	Yes/No
<b>Restoring the Council to good health</b> <i>The Council will be placed on a sound financial footing ensuring resilience – delivering the service its tenants deserve and expect.</i>	Yes/No
<b>We ♥ Castle Point</b> <i>To encourage pride of place in Castle Point - the Council will help create and maintain the best possible place to live in, work in and visit.</i>	Yes/No

**Lead Officer responsible for owning the Policy and internal approval body (meeting / board where the Policy is approved for adoption or approved for referral to PFH or Committee for adoption)**

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**Equality Impact Assessment undertaken?** Yes

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## **1. Introduction**

- 1.1 The Regulator of Social Housing (RSH) requires Castle Point Borough Council (the Council) to adopt an approach to complaints that is simple, accessible and publicised. Complaints should be resolved promptly, politely and fairly. The Housing Ombudsman Complaint Handling Code requires landlords to build a positive and consistent complaint handling culture.
- 1.2 Failure to handle complaints effectively can impact on the Council's overall customer satisfaction and result in an excessive amount of resources being used. Complaints will be resolved promptly whenever possible, with the individual circumstances taken into consideration.
- 1.3 The Housing Ombudsman Service says, "Landlords must make it easy for residents to complain and consider the Equality Act 2010 to anticipate the needs of and make reasonable adjustments for residents who need to use the complaints process." The Council is committed to doing this and residents making a complaint will be asked if they have any needs or disability that would require reasonable adjustments to be made under this Policy.
- 1.4 The complexity of a complaint and whether the resident is vulnerable or at risk will be considered as early as possible in the complaint process. Further information on dealing with complaints made by someone vulnerable or with a disability can be found in the Housing Reasonable Adjustments Policy.
- 1.5 The Council will not discriminate against anyone who makes a complaint. If a resident behaves inappropriately, the Council will seek to manage that behaviour as necessary and in line with the Unacceptable Behaviour Policy. All communication will be evaluated to consider the circumstances, including:
  - Whether there is a likelihood that complaints are being made to intentionally cause harassment, divert resources or to cause disruption.
  - Whether there have been persistent or unreasonable demands made in the past.
  - Evidence of abusive or threatening behaviour to staff or producing excessive correspondence or making excessive communications.
  - Whether the resident or their representative displays unreasonable behaviour.
- 1.6 Complaints can be resolved at any stage of the complaints process. Information on appropriate remedies is set out in the Housing Compensation Policy. Each complaint will be considered on the individual circumstances of the complaint and the person making the complaint. A blanket approach to complaints will not be taken, with each complaint being dealt with on its own merits and all relevant information and evidence considered.

## **2. Scope**

- 2.1 The Policy applies to all Council tenants and leaseholders and applies to all homes owned by the Council. For the purpose of this Policy, they will be collectively referred to as residents.

- 2.2 A complaint is defined in the Housing Ombudsman Service's (HOS) Complaint Handling Code. For this Policy, a complaint is "an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by Castle Point Borough Council, Council staff or those acting on behalf of the Council, affecting an individual resident or group of residents". This can include:
- a) something the Council has said it would do – and didn't;
  - b) the time it's taken the Council to resolve an issue;
  - c) a decision the Council has made; and
  - d) something the Council has done – and shouldn't have done.
- 2.3 The Council will consider and recognise the difference between a service request and a complaint utilising the Housing Ombudsman's guidance and example case studies in the Complaint Handling Code. If a resident is dissatisfied with the Council's response to their service request, it will be recorded as a complaint. For example, if a resident told the Council that they needed a repair, that would be a service request. But if the repair was refused by the Council or not completed to an acceptable standard, then a resident can make a complaint about that. Another example might be if a resident wishes to make a complaint about the anti-social behaviour of their neighbour; this will be managed following the Council's Anti-social Behaviour Policy, unless the complaint is regarding how the Council has managed the anti-social behaviour case.
- 2.4 During the period when the complaint is being investigated and managed in line with this Policy the Council will continue to work alongside the resident to find a resolution to the problem and resolve any immediate issues. Importantly, the Council will not wait for the outcome of the complaint before taking action to resolve an issue, or action a service request.
- 2.5 The Council will accept a complaint from a representative, including an MP or local Councillor, who is authorised by the resident wishing to make a complaint. This could be a friend or family member or a representative from an external organisation. The Council will require written permission from the resident wishing to make the complaint to deal with another party.
- 2.6 The Council will accept a complaint referred to it within 12 months of the resident becoming aware of the issue.
- 2.7 The Council will consider each individual circumstance of each complaint request. The Council will not deal with complaints:
- a) where legal proceedings have started with a claim form filed at court;
  - b) if matters have previously been considered under the Complaints Policy.
- When the Council decides not to deal with a complaint, it will provide an explanation for the resident or representative and the contact details of the Housing Ombudsman Service.
- 2.8 Where a resident is seeking compensation for personal injury, the circumstances around the alleged service failure will be investigated as part of the complaints process but residents will be advised to contact the Council's insurers regarding the personal injury claim.

- 2.9 The Housing Ombudsman Service will only investigate and adjudicate on complaints where there is, or was, a landlord/tenant relationship which includes residents who have a lease, tenancy, licence to occupy, or other arrangements to occupy premises owned or managed by the Council. A resident has the right to contact the Housing Ombudsman Service to challenge any decision made by the Council not to record a complaint.

### 3. Definitions

The Council	Castle Point Borough Council
HOS	The Housing Ombudsman Service
Leaseholders	Leaseholders are defined as anyone who owns a property under a leasehold agreement where the Council holds the right to the land on which the property sits.
Resident	Any Council tenant or leaseholder whose landlord is Castle Point Borough Council.
Tenants	Tenants are defined as anyone who holds and occupies a property that is owned or managed by the Council under a tenancy agreement.
TSMs	Tenant Satisfaction Measures – are a set of 22 mandatory performance indicators introduced by the Regulator of Social Housing (RSH) in England to evaluate landlord performance, enhance transparency, and allow tenant scrutiny. The TSMs comprise 12 tenant perception surveys and 10 operational data points, cover repairs, safety, complaint handling, engagement, and neighborhood management.

### 4. Aims of the Policy

- 4.1 All complaints are dealt with in line with the Council’s Complaints Process and the Housing Ombudsman’s Complaint Handling Code. All complaints will be welcomed, treated seriously and dealt with in a professional manner. The Council aims to resolve all complaints fairly, effectively and promptly.
- 4.2 The aims of this Policy are:
- a) To outline the Council’s approach to effectively managing complaints made by residents that relate to the landlord services provided by the Council.
  - b) To provide clarity to the tenants and leaseholders of the Council so they know how complaints can be made and how they will be handled.
  - c) To provide clarity to Housing Service members of staff who provide landlord services so they know how to receive a complaint and how complaints and residents must be treated.
  - d) To provide the framework through which lessons can be learnt from complaints, and services improved.

## **5. Policy Statement**

- 5.1 The Council is committed to handling complaints in accordance with the Housing Ombudsman's Complaint Handling Code. The Council will:
- a) give the resident a fair chance to set out their position;
  - b) be easy to reach and helpful at all times, with a customer friendly process that enables residents to be heard and understood;
  - c) deal with complaints on their merits, acting independently with an open mind;
  - d) take measures to address any actual or perceived conflict of interest;
  - e) try to resolve residents' issues as quickly as possible;
  - f) offer help and support to residents;
  - g) fully investigate complaints, considering all relevant information and evidence carefully;
  - h) learn from all mistakes; and
  - i) use learning from complaints to improve the services it provides to residents.
- 5.2 The Council's tenants and leaseholders can make a complaint to any member of staff, by telephone, email or face to face. A resident does not have to use the word "complaint" for it to be treated as such. If a resident expresses dissatisfaction with the service they have received, they will be asked if they would like to make a formal complaint.
- 5.3 Complaints are viewed as an opportunity for the Council to learn by identifying issues and introducing positive changes to service delivery. A high volume of complaints is viewed as a 'positive', as it can demonstrate an accessible complaints process.
- 5.4 Whenever the Council conducts a survey, or asks for wider feedback, residents will be reminded of how they can make a complaint if they wish to.

## **6. Legislation, Regulation and Guidance**

- 6.1 The Council is committed to ensuring that residents receive a fair, transparent and efficient complaints service, that ensures a positive complaints culture and effective resolution for residents.
- 6.2 The following list sets out the key legislation, regulation, and guidance:
- Data Protection Act 2018 and the General Data Protection Regulations (GDPR) 2018
  - The Housing Ombudsman Service Complaint Handling Code, 2024
  - The Regulator of Social Housing Neighbourhood and Community Standard, 2024
  - The Regulator of Social Housing Safety and Quality Standard, 2024
  - The Regulator of Social Housing Tenancy Standard, 2024
  - The Regulator of Social Housing Transparency, Influence and Accountability Standard, 2024

## **7. The Complaints Process**

- 7.1 The Council operates a two-stage complaint process, each with clear timescales that are compliant with the Housing Ombudsman's Complaint Handling Code, 2024. The Council will try to resolve a complaint at the first point of contact, for example when a complaint does not require further investigation. If the Council does resolve a complaint at the first point of contact it will ensure that it is logged as a complaint within the Council's IT system and will provide a response in line with Stage One of this Policy.
- 7.2 Complaints are owned by the relevant service area within Housing and investigated by managers who have been trained in managing complaints, in accordance with the Housing Ombudsman's Complaint Handling Code.
- 7.3 The Housing Customer Relations team's role is to:
- a) provide oversight to ensure compliance with the complaints process;
  - b) consider which complaints can be responded to as early as possible, and which require further investigation;
  - c) support lead officers with formal written complaint responses;
  - d) provide oversight to enable compliance with the Housing Ombudsman Complaints Handling Code and the Housing Ombudsman dispute resolution principles;
  - e) consider the complexity of the complaint and whether the resident is vulnerable or at risk;
  - f) support residents in navigating the complaints process and keeping them updated throughout the process.
- 7.4 Complaints are formally acknowledged:
- a) All complaints will be acknowledged, either by letter or email, within five working days of the complaint being received. If clarity is required as to the outcomes being sought, or if the basis of the complaint is not clear, the Housing Customer Relations team will contact the person making the complaint.
  - b) The acknowledgement will make it clear which aspects of the complaint the Council is and is not responsible for and clarify any areas where this is not clear. It will also set out the date the response is due.
  - c) Residents will also be provided with details regarding their right to access the Housing Ombudsman Service for advice at any time.
- 7.5 The Housing Customer Relations team will:
- a) assess the complaint and determine the most appropriate service area to investigate it;
  - b) discuss the complaint with the investigating manager and allocate for investigation;
  - c) gain the correct authority for permission to share from the resident, if the complaint is made by a third party.

## **8. Stage One Complaints**

- 8.1 Complaints can be made through a variety of ways, including by email, telephone, online, in writing or in person, and all staff should be able to take the details of a complaint and pass the details through to the relevant email contacts (housingcomplaints@castlepoint.gov.uk ) to enable them to be correctly recorded and acknowledged.

- 8.2 All complaints will be reviewed when they are first received to make sure they are within the scope of this Policy before they are acknowledged as a complaint. They will then be acknowledged as detailed in Section 7.4.
- 8.3 Once a formal acknowledgement has been sent to the resident to advise that the complaint has been logged and is currently being investigated, a folder should be set up in the 'Shared Complaints' folder for all documents and communications related to the complaint to be saved in. The response date will be no more than ten working days from the day the acknowledgement was sent.
- 8.4 Once a complaint has been logged it should not be withdrawn unless it was raised in error. All complaints that are received should be dealt with in line with this Policy and any issues not covered under landlord responsibilities should be made clear to the resident.
- 8.5 Complaints will be logged, categorised and recorded by the Housing Customer Relations Officer, with a brief overview of the complaint.
- 8.6 Once the complaint has been registered by the Housing Customer Relations Officer, it will be assigned to the investigating manager who will be responsible for carrying out a thorough and impartial investigation into the issues raised. This will involve discussions with others and checking existing records to establish whether the issue has been raised before. If the complaint is about a contractor working on behalf of the Council, the contractor will be asked to provide sufficient data, facts and information with supporting documentation to enable the Council's thorough investigation. The Council will then respond to the resident with the Stage One response letter.
- 8.7 The investigating manager may contact the resident to clarify exactly what the issue is and how they would like to see it resolved. If the issue is recurring the investigating manager will consider any previous reports as part of the background to the complaint, if this will help to resolve the issue.
- 8.8 The investigating manager must consider the complaint in full to enable them to decide whether the complaint should be upheld. If a time extension is required, this will be agreed with the resident in advance of the deadline date, along with dates to keep them updated while the investigation is ongoing.
- 8.9 Where a Stage One response cannot be sent within ten working days, the Housing Customer Relations Officer will explain the reasons for the need to extend the response period to the resident and, wherever possible, will provide them with a new date by which the resident can expect to receive a response. The response time will be extended by a maximum of 10 working days, and the Housing Customer Relations Officer will provide details of how to contact the Housing Ombudsman Service. Where it is not possible to respond in the additional 10 working days (and this will usually be in exceptional circumstances) the Housing Customer Relations Officer will agree with the resident suitable intervals for keeping them informed about their complaint.
- 8.10 At Stage One, the investigating manager will:
  - a) consider any vulnerabilities and consider any urgent actions that may be necessary;
  - b) fully investigate the complaint;
  - c) keep the resident informed of the progress of the complaint;

- d) send a full written response and confirmation of the agreed actions for any proposed resolution within 10 working days of the complaint being acknowledged that addresses all points raised in the complaint and provides clear reasons for any decisions; and
  - e) address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice.
- 8.11 A complaint response will be sent when the answer to the complaint is known. This may be before the actions needed to resolve the complaint are completed. In such cases outstanding actions must be carried out promptly and tracked until complete, with updates provided to the resident until all actions are complete. All repair work carried out as part of a resolution of a complaint must be post-inspected, and a copy of the post-inspection form stored in the complaint folder and shared with the resident.
- 8.12 If additional complaints are raised during the investigation, these must be incorporated into the Stage One response if they are related, and the response has not yet been issued. Where the Stage One response has been issued, or the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues will be logged as a new complaint.
- 8.13 All Stage One responses will follow the Council's template and will confirm in writing 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 and timescale;
  - f) details of any outstanding actions and timescale;
  - g) details of how to escalate the matter to Stage Two;
  - h) contact details of the Housing Ombudsman Service.
- 8.14 Finally, the Housing Customer Relations team will:
- a) check that any learning identified is fully recorded;
  - b) close the complaint, if no further contact is received after 10 working days of the resolution offer being sent;
  - c) ensure there is a full record of the complaint and the outcomes at each stage, retaining all relevant documents;
  - d) add any outstanding actions to the Complaints Tracker, so they can be actioned promptly and appropriate updates provided.

## **9. Stage Two Complaints**

- 9.1 If the resident remains dissatisfied, they can request to escalate to Stage Two within 28 days of receipt of the Stage One response. The Stage Two acknowledgement will set out the Council's understanding/definition of the complaint and will be sent within five working days. The complaints folder will be checked to ensure it includes all related information needed to carry out the Stage Two investigation.

Residents are not required to explain their reasons for requesting escalation to Stage Two. The person considering Stage Two must not be the same person who dealt with the complaint at Stage One.

- 9.2 The Housing Customer Relations team will:
- a) ensure there is a clear understanding about why the resident is dissatisfied with the Stage One response and, if required, contact the resident to clarify.
  - b) Clarify to the resident that the complaint has been escalated to Stage Two in writing within 5 working days.
  - c) assess any vulnerabilities and any actions that may be necessary.
  - d) prepare a Stage Two assessment pack detailing the actions taken to date, the reasons for dissatisfaction, highlighting any deficiencies or gaps in the Stage One investigation response or compliance with the Housing Ombudsman's Complaints Handling Code.
  - e) when a response cannot be sent within 20 working days, the Complaints Officer will send a holding response advising the reasons why and when the resident can expect a response, with details of the Housing Ombudsman Service.
- 9.3 At Stage Two, an Assistant Director is responsible for carrying out an independent review of the Stage One response. Their investigation will focus on the handling and reasonableness of the complaint at Stage One and whether Housing agreed policies and practices have been followed in full.
- 9.4 No new unrelated complaint issues should be considered at this stage. If new issues are raised this should be dealt with as a new complaint.
- 9.5 The Stage Two investigating manager will investigate the complaint under Stage Two by contacting the resident ensuring all relevant parties are consulted at the appropriate level to ensure the reason for dissatisfaction is responded to and any identified risks are managed.
- 9.6 A full written response will be sent within 20 working days from the Stage Two acknowledgement being sent. Where a Stage Two response cannot be sent within 20 working days, the Housing Customer Relations Officer will explain the reasons for the need to extend the response period to the resident and, wherever possible, will provide them with a new date by which the resident can expect to receive a response. The response time will be extended by a maximum of 20 working days, and the Housing Customer Relations Officer will provide details of how to contact the Housing Ombudsman Service. Where it is not possible to respond in the additional 20 working days (and this will usually be in exceptional circumstances) the Housing Customer Relations Officer will agree with the resident suitable intervals for keeping them informed about their complaint.
- 9.7 The Stage Two response will follow the Council's template and will confirm in writing 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 and the timescale;

- f) the details of the learning; and
  - g) the details of how to escalate the matter to the Ombudsman if the resident remains dissatisfied.
- 9.8 The Stage Two investigating manager will address all points raised in the complaint definition and provide clear reasons for any decisions, referring to the relevant policy, law and good practice.
- 9.9 The Stage Two investigating manager will ensure systems are in place to monitor and track the actions promised to resolve the complaint and that the actions are completed within appropriate timescales.
- 9.10 The Stage Two response letter is provided when the answer to the complaint is known and is not subject to the outstanding actions being completed. Residents will be provided with appropriate updates on any outstanding actions through to their completion. In all instances, where this involves a repair, work will be post-inspected, and the post-inspection report will be placed in the Complaints Folder and shared with the resident.
- 9.11 The Stage Two investigating manager will ensure that all learning identified is progressed including amendments to policies and procedures, where necessary.
- 9.12 Stage Two is the final stage of the complaints process. If the resident has not contacted the Council within two weeks of the Stage Two response being sent, the Housing Customer Relations Officer will contact the resident to check if they are satisfied and their complaint is now resolved, and to see if they have any questions. If the resident remains dissatisfied with the Stage Two response, they will be reminded of their right to contact the Housing Ombudsman Service.

## 10. Remedies

- 10.1 Each case needs to be considered on its own merits and circumstances. The Council will use the Housing Ombudsman's [guidance on remedies](#) to decide what the most appropriate remedy is in each individual case. Questions that will help the investigating manager decide what the appropriate remedy for a complaint is include the following:
- a) what has gone wrong?
  - b) can it be put right – what actions could be taken to remedy the situation?
  - c) how has the resident been adversely affected?
  - d) is there an actual quantifiable financial loss – for example, has the resident incurred costs because of what happened, or not received payments that they should have?
  - e) what other impact has there been (for example distress caused)?
  - f) did the resident's actions or inactions, or those of a third party (for example a resident's advocate), contribute to what happened in the case?
  - g) what remedy would be proportionate, appropriate and reasonable for the case.
- 10.2 Where something has gone wrong, the Council will acknowledge an error has occurred and set out the actions that have already been taken, or the Council intends to take (with a timescale) to put things right.

- 10.3 The Council will consider the cumulative impact of any service failure. The impact experienced by the resident could include distress and inconvenience, time and trouble, disappointment, loss of confidence, and delays in getting matters resolved.
- 10.4 All staff and contractors will take a collaborative and co-operative approach to resolving complaints promptly and work together to take collective responsibility for any failing, acting professionally and adopting the principles set out in this Policy.
- 10.5 The Council will endeavour to agree on any remedy with the resident, setting out what will happen, and the timescale. The Housing Customer Relations Officer will follow through with any proposed remedy, making sure it is completed on time.

## **11. Complaints Referred to the Housing Ombudsman Service**

- 11.1 Residents have the right to refer their complaint to the Housing Ombudsman at any point during the investigation and details of how to do this will be included in the complaint correspondence. The Housing Ombudsman will not begin their own investigation into the Council's complaint handling, until the Stage 2 complaint process has concluded.
- 11.2 Following the exhaustion of the Council's complaints process, complaints may be investigated by the Housing Ombudsman Service, and the resident can refer their complaint to them.
- 11.3 The Housing Customer Relations team will:
  - a) respond to all correspondence and requests for information from the Housing Ombudsman within the specified timescales.
  - b) review the outcome of the Ombudsman's investigation and either accept the outcome or ask for a review of the decision.
  - c) where the Council accepts the outcome of the Ombudsman's investigation it will act upon any findings or recommendations by them.
  - d) work closely with the relevant senior officer to respond to the Ombudsman within their given timescales.

## **12. Self-assessment Reporting and Compliance**

- 12.1 The Council has appointed the Complaints Monitoring Officer as the complaints lead (Assistant Director – Legal and Democratic Service & Monitoring Officer). The Complaints Monitoring Officer will meet regularly with the Senior Leadership team to ensure learning from complaints feeds into policy and procedural reviews and is documented in improvement plans for all service areas.
- 12.2 The Council will undertake an annual self-assessment (See Appendix A) against the Complaint Handling Code; this will be published on the Council's website. The Council will undertake a review sooner, if directed by the Housing Ombudsman Service, or if there is a change in system or procedures.
- 12.3 The Assistant Director of Housing will produce an annual complaints performance and service improvement report for scrutiny and challenge that will be shared with the Council's Resident Panel, Senior Leadership team and Cabinet to include:

- a) The Council's annual self-assessment against the Housing Ombudsman's Complaint Handling Code, to ensure the Complaints Policy remains in line with the requirements.
  - b) A qualitative and quantitative analysis of the Council's Housing Service complaint handling performance. This will also include a summary of the types of complaints the Council's Housing Service have refused to accept.
  - c) Any findings of non-compliance with the Complaint Handling Code by the Housing Ombudsman.
  - d) The service improvements that have been made because of the learning from complaints.
  - e) Any annual report about the landlord's performance from the Ombudsman.
  - f) Any other relevant reports or publications produced by the Ombudsman in relation to the work of the Council.
- 12.4 The Annual Housing Complaints Performance and Service Improvement Report will be published in the complaints section of the Council's website. The Assistant Director for Housing will report back on wider learning and improvements from complaints to stakeholders, involved residents, and staff. A formal report will be made to the Council Audit and Governance Committee and Cabinet.

### **13. Monitoring and Continual Improvement**

- 13.1 All complaints must be recorded on the Housing IT system and a folder set up for each complaint if required. This will monitor complaint categories, relevant dates, outcomes and learnings. A quarterly report on complaints will be produced by the Head of Housing Management and sent to the Senior Leadership Team and Member Responsible for Complaints (MRC).
- 13.2 Monthly complaints performance will be monitored closely by the Assistant Director of Housing, to make sure the strict timeframes in the Housing Ombudsman Complaint Handling Code are achieved, and that the Council's residents receive the complaints service they deserve.
- 13.3 Internal and external audits and reviews provide data reflecting the effectiveness of this Policy and identify opportunities to achieve continual improvement in the management of the Council's complaint handling. An action plan will be developed for any issues identified during the review or audit, with appropriate timescales agreed for corrective actions to be carried out. Other checks and reviews may be undertaken periodically as required.

### **14. Data and Records**

- 14.1 The Council will maintain a comprehensive record of all complaints, track actions, and make sure the data and records are up to date and stored in a secure IT system that complies with Data Protection legislation.
- 14.2 The Council is committed to collecting and maintaining information on its tenants and leaseholders; this is called customer profiling information. This customer profiling information will be used to help support the complaints service provided to the Council's Housing Service residents.

- 14.3 The Council will keep all records and data in line with its Document Retention Policy and will have robust processes and controls in place to maintain appropriate levels of security for all complaint-related data, including how it will share sensitive information with its contractors and the Housing Ombudsman Service.
- 14.4 The Council will dip sample periodically to make sure that the data on the Housing IT system demonstrates compliance with this Policy.

## **15. Equality, Diversity and Inclusion**

- 15.1 The service to the Council's residents is of the utmost importance. This Policy has been written to protect all concerned, considering all protected characteristics as set out in the Equality Act 2010.
- 15.2 The Council will ensure that relevant information is communicated in an accessible and understandable way. This may include, in some cases, liaising with those giving support to a tenant (in accordance with Data Protection).
- 15.3 An Equality Impact Assessment has been carried out (See Appendix 1).

## **16. Training**

- 16.1 All customer facing staff must be trained and be aware of the Complaints Policy, and any related policies, and fully understand their responsibility in handling complaints, service requests and expressions of dissatisfaction.
- 16.2 The Council will maintain a skills/training matrix to ensure that all Council employees undertaking key roles within the scope of this Policy have appropriate training.
- 16.3 The Council will operate a detailed competency framework, including regular appraisals, as part of the Council Housing Complaints Policy.
- 16.4 Training will be carried out to ensure that all staff understand their responsibilities for complaints, service requests and expressions of dissatisfaction, according to their roles and responsibilities, as covered in this Policy.
- 16.5 Training records will be maintained for all courses attended.
- 16.6 The Ombudsman's e-learning modules are available for all staff involved in the complaint process.

## **17. Communication**

- 17.1 Once the Policy is approved, a summary document "a policy on a page" will be placed on the Council's website with a link to the full Policy. An approved version of this Policy will be published internally and will be accessible to staff.
- 17.2 The Council will include articles in its resident newsletter periodically and on its website that remind the Council's residents how to make a complaint.
- 17.3 Information on how to make a complaint will be available in a clear and accessible format and readily available through all communication channels. Hard copies can be provided upon request. There is a translate function on the website to help those residents whose first language is not English.

- 17.4 Relevant information, such as tenant contact information, will be shared with all contractors, to be sufficient for them to carry out their role in line with this Policy, and in accordance with Data Protection requirements.
- 17.5 The Council will also aim to successfully engage with vulnerable and hard to reach tenants and leaseholders. The Council will share information clearly and transparently and will ensure that information is available to tenants and leaseholders via regular publications and information on its website.

## **18. Review of Policy**

- 18.1 This Policy will be reviewed every two years, unless new legislation or good practice, or in the event of being contacted by the Housing Ombudsman Service or the Regulator of Social Housing means it needs to be reviewed sooner.

## **19. Consultation**

- 19.1 The Council is committed to meaningful tenant and leaseholder engagement and involvement. The Council intends to consult with tenants and leaseholders on this Policy, once its structure for tenant and leaseholder engagement is in place following the work the Council is doing with the Tenant Participation Advisory Service (Tpas).

## **20. Associated Policies and Procedures**

Council Housing Compensation Policy 2025

Council Housing Reasonable Adjustments Policy 2025

Castle Point Borough Council's Unacceptable Behaviour Policy 2024

Council Housing Complaints Policy on a Page

## **21. Appendices**

Appendix 1: Equality Impact Assessment for Council Housing Complaints Policy