



LONDON BOROUGH OF
HARROW

**Housing Services - Complaints &
Compliments Policy and
Procedure
April 2024**

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Important Contact Information

1. London Borough of Harrow

Call: 020 8901 2630

See the website at: www.harrow.gov.uk/complaints

Email: housing.customerservices@harrow.gov.uk

Write to: London Borough of Harrow

Housing Services

PO Box 1367

Harrow, HA3 3QT

2. Housing Ombudsman

Call: 0300 111 3000

See the website at: www.housing-ombudsman.org.uk

Email: info@housing-ombudsman.org.uk

Write to: Housing Ombudsman Service

PO Box 1484, Unit D

Preston PR2 0ET.

3. Local Government and Social Care Ombudsman

Call: 0300 061 0614

See the website at:

<https://www.lgo.org.uk/how-to-complain>

Write to: Local Government and

PO BOX 4771

Coventry CV4 0EH.

4. Care Quality Commission (CQC)

Call: 03000 616 161

See the website at:

<https://www.cqc.org.uk/contact-us/contact-us-online-form>

Email: enquiries@cqc.org.uk

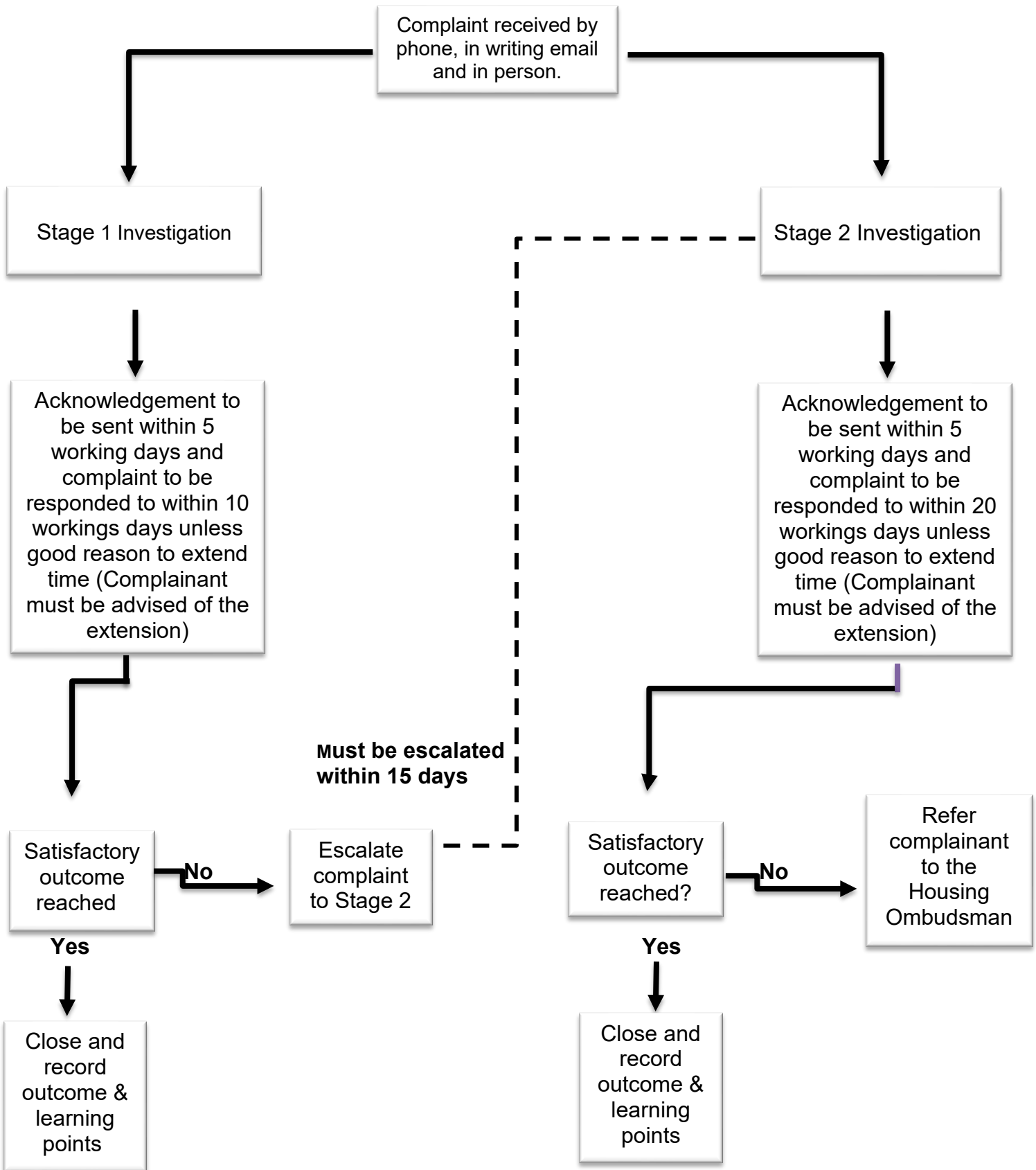
Write to: Care Quality Commission

Centre Citygate,

Gallowgate,

Newcastle Upon Tyne, NE1 4PA.

Complaints procedure Flowchart



1. Introduction

London Borough of Harrow is committed to providing a high-quality service at all times to our customers. However, we recognise that there are occasions when our services fall below our expected standards and, as a result, customers may be inconvenienced.

We will embrace complaints through increased transparency, accessibility, and complaint handling governance, demonstrating that residents are core to our service delivery and good complaint handling is central to that.

As a part of our commitment to learning from complaints, we will endeavour to offer a suitable remedy at an early stage to customers. This may include compensation.

Complaints give us an insight into problems and concerns, and we want to learn from the feedback they provide to improve the way we do things.

This policy is specific to Housing Services, and should be read together with the council's complaints policy and guidance, which is available here [Complaint Policy and Review \(harrow.gov.uk\)](#). In addition, this policy also ensures that our procedures are aligned with the [Housing Ombudsman's Complaint Handling Code](#). We have carried out the annual self-assessment against this Code to ensure the complaint handling policy remains in line with its requirements.

The Housing Ombudsman complaint code states that we must log a complaint if the tenant is dissatisfied. However, if the tenant has said they do not want it logged as a complaint they just want it sorted, any decision to try and resolve a concern will be taken in agreement with the resident. We will keep a record to demonstrate this. We will ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay.

If an issue cannot be resolved in the course of the day-to-day management of a service, residents may decide to make a complaint. London Borough of Harrow as landlord will manage all resident complaints ourselves.

2. Aims and Objectives

All feedback should be dealt with in a fair, confidential, consistent, and timely manner.

The objectives of this policy are to:

- provide an accessible means for all service users, or their advocates, to complain if they are dissatisfied, or to offer compliments and suggestions if they choose;
- provide a fair and consistent process for resolving complaints;
- deal with complaints on their merits, acting independently with an open mind
- be clear, simple, accessible and to ensure complaints are resolved
- promptly, professionally and fairly.
- establish timescales for complaint resolution;
- work towards an agreed solution

- facilitate the use of complaint information as a means of monitoring performance and improving services;
- ensure complainants and members of staff have the same rights to be treated with courtesy and respect;
- ensure that plain English is used when answering customer complaints.
- learn from our mistakes
- use complaints to improve the services we provide to our residents

3. Responsibilities.

The responsibilities for the resolution of complaints are set out below for employees. The priority is the effective handling of complaints at, or as close to, frontline staff or by a local manager. It is important all staff receive the necessary support and guidance to handle complaints.

3.1 All staff are responsible for the following:

- at the pre formal stage, striving to resolve as service request, and if this is not possible,
- referring the matter to an appropriate officer to action.
- having an understanding of stages of the complaints policy and procedures;
- ensuring that the agreed timescales are met, and procedures are followed.

3.2 The Housing Customer services Manager is responsible for the following:

- ensuring that all complaints are managed in accordance with the Council's complaints policy.
- Making sure that various deadlines are met.
- managing the Council's responses to all complaints referred to by any Ombudsman
- Ensuring data is kept in accordance with monitoring requirements.
- promoting learning from complaints.
- on receipt of compliments ensuring that appropriate staff receive a copy of the correspondence.

3.3 Director of Housing and Heads of Service, Operations Managers from respective teams are responsible for the following:

- the proper adherence to the Council's complaints policy and policy guidelines by staff;
- overseeing the handling of complaints by their staff at Stage 1;
- ensuring that, where possible, frontline staff within their service are supported to resolve complaints.
- advising staff on the complaints procedure; Corporate Directors are responsible for the following:
- ensuring the proper adherence to the Council's complaints policy and policy guidelines by their department;

- engaging in Stage 2 of the complaints procedure to offer a service led review of complaints;
- considering complaints monitoring information in the planning and improvement of services;
- implementation specific procedures, if actions by complainants are deemed to be unacceptable
- on receipt of compliments ensuring that appropriate staff receive a copy of the correspondence.
- on receipt of compliments ensuring that appropriate staff receive a copy of the correspondence

3.4 Corporate Directors are responsible for the following:

- ensuring the proper adherence to the Council's complaints policy and policy guidelines by their department;
- implementation specific procedures, if actions by complainants are deemed to be unacceptable.
- on receipt of compliments ensuring that appropriate staff receive a copy of the correspondence.

4. Complaints

4.1 Defining a complaint

4.11 We use the Housing Ombudsman's definition of a complaint which is defined as: *'An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'*

4.12 Tenants, leaseholders and shared owners of London Borough of Harrow can make a complaint to any member of staff however they choose including face to face, telephone or by completing the complaints form online. A resident does not have to use the word "complaint" in order for it to be treated as such.

4.13 Complaints may be raised by a member of Parliament or a local councillor, or via a third party or representative. Where we receive a complaint as per the definition in section 4.1, we will follow our complaints policy and procedures.

4.14 Should a customer raise dissatisfaction through a public social media channel, we will initially follow this up directly through a private channel to ensure the issue is dealt with confidentially.

4.15 Whenever we conduct a resident survey, we will always remind residents of how they can make a complaint if they wish to. When we are asking for wider feedback, we will also provide details of how they can make a complaint.

4.16 Anonymous complaints will be investigated, and we will report the outcome to our involved resident forum such as the Residents' Board.

4.2 Defining a Service Request

4.21 Often a customer's concerns can be resolved at 'first point of contact' and will not need to go through our two stage complaints process. These are known as 'Service Requests'. Initially staff should always try and help a customer and try to resolve any problems they have at first point of contact. The emphasis is on resolving problems and putting them right with the minimum of delay.

4.22 Not all requests will be suitable for resolution immediately, however we will empower our staff to do what they can to progress any concerns at the first point of contact. We would expect issues that are straightforward and easily resolved, requiring little or no investigation, to be provided with an 'on-the-spot' apology, explanation, or other action to resolve the request immediately, unless there are exceptional circumstances.

4.23 A service request is when a customer contacts us to ask us to do something to their home or tenancy, for example, a repair. It will not be treated as a complaint but if we fail to carry out the repair this may become a complaint. Similarly, a customer may raise an enquiry where they ask us about something relating to their home or tenancy. For example, a resident would like to receive a copy of their rent account. This too would not be a complaint but may become one if we fail to provide the information requested.

4.24 If a resident is reporting an issue with their home or neighbourhood for the first time this is not a complaint, it is a service request, for example:

- reporting a repair
- reporting neighbourhood issues
- reporting anti-social behaviour

We 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. A complaint must be raised when the resident expresses dissatisfaction with the response to their service request.

We endeavour to deal with service requests within **10 working days**.

5.0 Safeguarding

If we receive a complaint about safeguarding, we will follow the steps set out in our safeguarding policy to address it. We have detailed procedures and that follow the different local safeguarding Information sharing protocols. The Head of Resident First is the safeguarding lead and will report the information.

6.0 Complaints that fall outside of the Council's complaint policy

Certain types of complaint will not be dealt with through the Council's complaints procedure because there are other processes more suitable for dealing with them, or because they are outside the Council's control. This includes, though not exclusively:

- We will only deal with matters brought to our attention within a reasonable timeframe. Unless there is a good reason for not making a complaint at the time, the limit will be no more than twelve months after the event occurred, or the matter came to the notice of the complainant. However, if the problem is a recurring issue, we will consider older reports as part of the background to help to resolve the issues for the customer. Matters of law or central government policy.
- Complaints from staff about personnel matters, including appointments, dismissals, pay, pensions and discipline.
- Complaints where the customer or the Council has started (not threatened) legal proceedings.
- Complaints about the merits of an insurance claim or matters that would be more appropriately considered by an insurer.
- Complaints under statutory obligations. Timescale for responding to a Section 20 observation.
- Reasonableness of service charges
- Complaints that have already been decided by a court or independent tribunal.
- Complaints that have already been decided by either the Local Government Ombudsman or the Housing Ombudsman
- On a small number of occasions as a last resort, we may withdraw the complaints procedure from a complainant whose behaviour is unreasonable, or we may have to restrict contact. An example of this would be if someone raises the same complaint several times in different ways. We will explain why we have taken this action to the complainant or their advocate (See Unacceptable Behaviour Policy).
- If customers are dissatisfied with the way we have handled their personal information, they can use this policy, contact our Data Protection Officer, or contact the Information Commissioner's Office on 0303 123 1113.
- Services for which there are alternative statutory appeal or tribunal processes, including:
 - Appeals against the refusal of planning permission
 - First Tier Tribunal
 - Reporting breaches of planning regulation
 - Appeals against statutory Notices
 - Parking appeals
 - School admission or exclusion appeals
 - Special Educational Needs Tribunals
 - Housing Benefit appeals
 - VTE appeals for Business Rate, Council Tax & Council Tax Support
 - Subject Access Reports
 - Freedom of Interest requests
- Enforcement Agent fees

- Complain about a councillor.

If we receive a complaint that we cannot accept, we will provide a detailed explanation, with reasons why the matter is not suitable for the complaints process, and the right to take that decision to the Ombudsman.

7.0 How to make a complaint

Residents can make a complaint by:

- writing to us
- calling us
- using the council's complaint web form
- emailing us
- Speaking with anyone in Housing Services
- Speaking with MPs or Local Councillors

When making a complaint, please provide as much information as possible, including your name, contact details, and a detailed description of the issue.

7.1 Complaints through third parties

We recognise that some people who wish to complain may need support to do so. We accept complaints made by third parties (including, for example, family members, friends, advocates, or support workers) on behalf of a complainant, and will take steps in line with our Data Protection Policy to make sure that the complainant is in agreement, which may include seeking written permission where this is necessary. We will also give customers the opportunity to be accompanied or represented by a third party at a meeting with us about a complaint where this is reasonable.

Councillors and Members of Parliament (MPs) may also bring a formal complaint by acting as their constituent's advocate; formal complaints will be handled in line with this Complaints and Compliments Policy, and not as an enquiry under our Members' Enquiry Procedure.

There are 2 stages to our complaint's procedure each with clear timescales which are compliant with the Housing Ombudsman's Complaint Handling Code 2024.

7.2 Complaint acknowledgement

Once we have received your complaint, we will provide a written or electronic acknowledgement of receipt within **five working days**. The acknowledgement will include:

- a summary of the complaint as we understand it
- the date you should expect a full response
- contact details of the sender
- The team that is handling the complaint

7.3 Complaint stages and timescales

There are two stages to our complaint process: stage 1 and stage 2. The timescales start as from the date the complaint was received by the Council, not within the department against which the complaint is made.

7.4 Stage 1 complaint

In accordance with the Housing Ombudsman Complaint Handling Code, we will acknowledge your complaint within **5 working days** of complaint being received and issue a response **within 10 working days** from the date of acknowledgement. This may involve discussing the matter with you, carrying out an investigation, or taking any other necessary actions to address the issue.

If we decide whether an extension to this timescale is needed when considering the complexity of the complaint and then we will inform you of the expected timescale for response. This should not exceed a further 10 days without good reason. At this point we will also give contact details of the Housing Ombudsman.

Good reasons for not being able to meet these timescales may include where a customer cannot be contacted or has made a request to be contacted at specified times which are outside of the complaint response timescales.

Finally, the Housing Customer service team will:

- check the learning log is complete to ensure any learning identified is fully recorded the date you should expect a full response.
- close the complaint if no further contact is received from the resident after 10 working days of the resolution offer being sent.
- ensure we have kept a full record of the complaint and the outcomes at each stage, retaining all relevant documents.
- add any outstanding actions to our complaints tracker, so they can be actioned promptly and appropriate updates provided to the resident.

When a resident raises 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, 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.

7.5 Stage 1 Response

All stage 1 responses will follow our template that will confirm in writing in clear plain language.

- the complaint stage
- the complaint definition
- the decision on the complaint
- the reasons for any decisions made
- the details of any remedy offered to put things right and timescale
- details of any outstanding actions and timescale
- details of how to escalate the matter to stage 2 if the individual is not satisfied with the response

7.6 Escalation to Stage 2

When a resident is dissatisfied with the outcome of the stage 1 response, they have **15 days** to be provided with the opportunity to ask for their complaint to be escalated if they feel their complaint has not been resolved. We will always consider the individual circumstances of each complaint.

However, if the resident would like to escalate their complaint and they have not been able to do so within the timescale, we will apply a level of discretion whether an extension should be granted. For example, medical reasons a resident has not been able to meet the deadline.

7.7 Stage 2 complaint

If the complaint cannot be resolved in the first stage, you have the option to escalate your complaint to stage 2.

We may ask the resident to allow us time to carry out the actions set out in our stage 1 response, before they escalate their complaint to stage 2 of the process. Where we do this, we will set out the reasons why it is not suitable for the complaint to be escalated and the right to take the decision to the Housing Ombudsman Service.

In accordance with the Housing Ombudsman Complaint Handling Code, we will acknowledge your complaint **within 5 working days of complaint** being received and issue a response within **20 working days** from the date of acknowledgement.

For stage 2, an independent officer from a different team will be appointed to ensure an independent review of stage 1 investigation. Our stage 2 investigation will involve all suitable staff members needed to make sure all issues are addressed, and a thorough response can be issued to the resident.

We will keep you informed of the progress of your complaint throughout the process and provide regular updates on any delays or changes to the expected timescales.

Our complaint response may include follow-on actions. Proposed actions may be completed beyond the timescales for the complaint response. These actions will be scheduled with a timescale for completion within our complaint response.

The Officer will investigate the complaint under stage 2 by making contact with 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.

We will provide a written stage 2 response in plain language when the answer to the complaint is known that confirms the following:

- 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 timescales.
- f. the details of the learning g. the details of how to escalate the matter to the Ombudsman if the individual remains dissatisfied

Also:

- ensure systems are in place to monitor and track the actions promised to resolve all complaints and that they are completed within appropriate timescales.
- ensure that all learning identified is progressed including amendments to policies and procedures.

If your complaint remains unresolved after the above stages, you can escalate your complaint to the Housing Ombudsman or the Local Government Ombudsman to investigate on your behalf.

7.1 Extending response timescales

We aim to resolve complaints as quickly as possible, but some complaints may require more time to investigate fully. It may be necessary to extend the timescales set out in this policy. If this is the case, you will be informed of the reason why timescales cannot be met and informed when you will receive a full response.

Should there be delays in being able to provide a stage 1 or stage 2 response within these timescales, the complaints officer will ensure this is fully explained to the resident with an explanation for the delay. Where possible any extension outside of these timescales will be agreed with the resident. Where a resident is dissatisfied or is in dispute with the proposed response timescales, the resident will be reminded of the ability to refer this to the Housing Ombudsman Service and their details will be provided.

7.4 Right to escalation

The full response to the complainant at all stages should include information on the right to escalate the complaint. The complainant should be advised that if they remain unsatisfied, they will have to:

- (a) Submit a written response to the Council providing details of why they remain dissatisfied; and

- (b) Submit the response within one month from the date of the full response letter.
- (c) Follow the correct appeal route or be told there is no appeal if it is not a complaint within our definition.

7.5 Time Limits

It is far easier to find out what happened and to put things right if complaints are received at the time. As time passes it becomes more difficult to investigate events fairly and fully – people’s memories fade, staff who were closely involved may have left the Council, or records may no longer be available.

For these reasons, the Council will normally only accept complaints made within twelve months of the incident or circumstances that lead to the complaint. However, if there are exceptional circumstances (illness, changes in personal circumstances, etc) provided by you for the delay in submitting the complaint, the Council may make a discretionary decision to consider the complaint providing the circumstances are evidenced.

If the Council receives a complaint and decides to not to accept it on the above grounds, you will be told why.

7.6. Complaint Outcomes

Housing services categorises decisions about complaints as:

Complaint upheld

This is where Housing Solutions agree that the complaint was justified and that there has been a failure to provide the service to the expected standard.

Complaint partially upheld

This is where Housing Solutions agree that part of the complaint was justified and there has been a failure to provide the service to the expected standard and part of the complaint was not justified and is therefore not fully upheld.

Complaint not upheld

This is where Housing Solutions do not agree that the complaint was justified. If the complaint has not been upheld Housing Solutions may make the decision not to allow the complaint to be progressed any further through the internal complaint stages.

8. Putting it right

Where something has gone wrong London Borough of Harrow will acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:

- apologising
- acknowledging where things have gone wrong.
- providing an explanation, assistance, or reasons.
- taking action if there has been delay.
- reconsidering or changing a decision.
- amending a record or adding a correction or addendum.
- providing a financial remedy.
- changing policies, procedures, or practices.

Any remedy offered will reflect the impact on the resident because of any fault identified. Any remedy proposed will be followed through to completion.

The complaint Handling codes states that the landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.

9. Remedies and compensation payments

Each case needs to be considered on its own merits and circumstances. We will use the Housing Ombudsman guidance on remedies to decide what the most appropriate remedy is in each individual case. Questions that will help us decide what the appropriate remedy to a complaint is include the following:

- what has gone wrong?
- can it be put right – what actions could be taken to remedy the situation?
- how has the complainant been adversely affected?
- is there an actual quantifiable financial loss – for example, has the complainant incurred costs as a result of what happened, or not received payments that they should have?
- what other impact has there been (for example distress caused)?
- did the complainant's actions or inactions, or those of a third party (for example a complainant's advocate), contribute to what happened in the case?
- what remedy would be proportionate, appropriate, and reasonable in the circumstances of the case?

Housing Customer Services officers will consider the cumulative impact of any service failure. The impact experienced by the complainant could include distress and inconvenience, time and trouble, disappointment, loss of confidence, and delays in getting matters resolved.

9.1 Compensation conditions

- (a) Housing Services will not offer compensation where service failure is the result of extreme or unforeseen circumstances, where they have taken all reasonable steps to restore services, or facilities under the prevailing conditions.
- (b) In addition, compensation will not be considered if the remedies are offered / undertaken within the service standards published by the Council

- (c) Compensation will not be offered where officers have acted reasonably and complied with legal and contractual obligations and in line with service standards.
- (d) Non-monetary benefits will not be offered as a method of compensation, for example a new kitchen or a quicker transfer.
- (e) If you are in rent arrears or have sundry debts against your account compensation will (except in financial loss payment cases) only be paid directly to the rent account to reduce outstanding arrears and/or sundry debts, subject to your consent.
- (f) Housing Services will not pay compensation for loss of, or damage to, personal items which would otherwise be covered by home contents insurance. It is a tenancy obligation that residents always ensure enough home contents insurance cover.
- (g) Personal injury complaints will be dealt with by the insurance company employed by Housing Solutions and any compensation payments will be paid on the Insurer's recommendation.
- (h) Any offer of compensation will be made on the basis that it does not constitute admission of legal liability.

Further information and guidance on compensation to residents is contained within the Compensation Policy.

9.2 Withholding Rent or Service Charges

Where a resident is dissatisfied with an aspect of our service and/or makes a formal complaint about the matter, they should work with us to resolve the dissatisfaction or complaint in accordance with this policy. Residents are not entitled to withhold payment of rent or service charges pending resolution of the issue concerned.

10. Support and advocacy

Many people feel daunted at the prospect of making a complaint. They may be unsure about how to go about it, or how best to put their case. The council has a positive approach to complaints and will encourage people to seek the support of friends or other advocates such as Citizens Advice Bureau. The Council may be able to assist people in finding such support give assistance to people who have difficulty with written or spoken English by signposting them to organisations which may be able to provide support in dealing with their complaint and to disabled people.

The council will, where appropriate, accept complaints from advocates or third parties, provided that the person affected has given their prior written (email/letter) consent.

11.0 Complaints referred to the Housing Ombudsman Service

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, who will support a resident through the complaints process.

Housing Ombudsman will not begin their own investigation into the council's complaint handling until the 2-stage complaint process has concluded.

Following the exhaustion of the council's complaint procedure, complaints may be investigated by the Housing Ombudsman Service and the resident can refer their complaint to them.

The Housing Customer Service Team will:

- respond to all correspondence and requests for information from the Housing Ombudsman within the specified timescales
- review the outcome of the Ombudsman's investigation and either accept the outcome or ask for a review of the decision
- where we accept the outcome of the Ombudsman's investigation we will act upon any findings or recommendations by them
- work closely with the relevant senior officer to respond to the Ombudsman within their given timescales.

The HO resolves disputes involving tenants and leaseholders of social landlords. They can be contacted at any time for advice and guidance regardless of the stage of your complaint.

The Housing Ombudsman can be contacted in several ways:

- By email: info@housing-ombudsman.org.uk
- Fill in the online complaint form at: www.housing-ombudsman.org.uk/residents/make-a-complaint/
- Call: 0300 111 3000
- Post your complaint to: Housing Ombudsman Service, PO Box 1484, Unit D, Preston PR2 0ET

You can find out more about the service the Housing Ombudsman provides and how they deal with complaints on their website at www.housing-ombudsman.org.uk.

12.0 Local Government and Social Care Ombudsman (LGSCO)

The LGSCO investigates complaints about most council services, including:

- Adult social care
- Children's services
- Education
- Some housing complaints
- Benefits and tax
- Planning and building control

- Transport and highways
- Leisure and culture
- Corporate services

Further information on referring your complaint to the LGSCO can be found at www.lgo.org.uk/how-to-complain

13.0 Unreasonable and unreasonably persistent complainants

The council is committed to dealing with all complaints fairly and impartially and to providing a high-quality service to those who make them. As part of this service there is not normally a limit on the contact complainants have with the council. However, there may be complainants who, because of the frequency of their contact with the council, hinder its consideration of their and other people's complaints. Such complainants may be referred to as "unreasonable and unreasonably persistent complainants". The complaints may become persistent, vexatious, or repetitive. The complainant may, despite having had an original complaint investigated and been notified of the outcome, not accept that the matter is concluded. The complainant will have exhausted the internal complaints procedure. Exceptionally therefore it may be necessary to take action to limit or terminate their contact with the council.

In consultation with the Director of Legal & Governance service or the Director of Customer Services and the Corporate Complaints Officer shall be authorised to identify a complainant as "unreasonable or unreasonably persistent" under the terms of this policy.

13.1 Before applying this policy, the Director of Customer Services or Corporate Complaints Officer shall:

- Ensure that the complainant has exhausted the internal complaints procedure
- Ensure that the complainant has been reminded of his/her right to refer the complaint to another body e.g. The Local Government Ombudsman
- Ensure that the complainant has been reminded of his/her right to obtain independent professional advice.

The Corporate Complaints Officer shall determine any restrictions which shall be imposed in respect of a complainant deemed to be "unreasonable or unreasonably persistent". Any restrictions imposed will be appropriate and will normally follow a warning to the complainant. The options most likely to be considered are:

- Requesting contact in a particular form (for example, letters only)
- Requiring contact to take place with a named officer
- Restricting telephone calls or visits to specified days and times
- Terminating further communication

In all cases where it is decided to treat someone as an unreasonable or unreasonably persistent complainant, the council will write to tell the complainant why his or her behaviour falls into that category and what action is being taken as above.

14. Compliments

We take pride in delivering an amazing service and where we succeed, we welcome the compliments customers share with us. We know how powerful positive feedback can be, so we endeavour to use this to improve our service and recognise our employees. When customers take the time to praise a colleague or team, we will always share your compliment with them.

Compliments can be made:

- writing to us
- calling us
- using the council's complaint web form
- emailing us through our corporate social media (to maintain confidentiality and privacy we may ask the individual to contact us with more detail by direct (private) message or through the options above);

A summary of the approach when a compliment is received is detailed below.

- We will acknowledge compliments at the time they are made.
- We will disseminate the compliment to the individual/team and Service detailing what the compliment is.
- We will use compliments to evidence service, team or individual success.
- We will regularly review and share through staff briefings.
- Finally, we will quantify and publish it on our Annual Reports.

15. Suggestions

You may have an idea for improving our services. If you do, we would like to hear about it. We will acknowledge your suggestions and let you know how we will use them or explain why we are unable to.

16. Confidentiality

Harrow Council will treat all complaints confidentially and will only disclose information to third parties if it is necessary to do so to resolve the complaint.

Compliments are recorded and passed on to the relevant member(s) of staff and their line manager. We review and report on compliments to identify and share good practice from which we can learn and improve our services.

17. Recording, Monitoring, Review, and Evaluation

All complaints are recorded. We monitor the number of complaints and the service areas to which they relate. Customer satisfaction with complaint handling and outcomes are monitored using satisfaction surveys run by an independent third-party supplier.

Lessons learnt from complaint investigations and service improvements are recorded, monitored, and reported to senior management.

We work closely with our customer volunteers to monitor the quality, outcomes and learning opportunities from our complaints process.

The Complaints and Compensation Policy and connected procedures will be reviewed as a minimum every three years or in response to future regulatory changes.

18. Responding to survey feedback

If we receive feedback from a survey that was sent to you, and dissatisfaction was expressed as per the complaint definition in point 3.1 above, we will, where possible, contact you to see if you would like to escalate the matter as a complaint.

19. Self-assessment, reporting and compliance

The Head of Insight and Housing strategy, performance will meet regularly with heads of service or present periodic reports to the Housing Management Senior Team (HSMT) to ensure learning from complaints feeds into improvement plans for all service areas. This report will also be circulated, and feedback sought at various forums;

- (a) Meetings with Portfolio Holder for Housing
- (b) Resident Board
- (c) Complaints and Scrutiny Panel which is yet to be set up.

19.1 We will undertake an annual self-assessment against our complaint policy in line with the handling code, this will be published on our website. We will undertake a review sooner, if directed by the Housing Ombudsman Service, or if we have a change in system or procedures.

19.2 The Head of Insight and Housing strategy, performance will produce an annual complaints performance and service improvement report for scrutiny and challenge that will be shared with our involved residents, senior leadership team and cabinet to include:

- a) our annual self-assessment against the Housing Ombudsman Complaint Handling Code 2024 to ensure our complaint handling policy remains in line with its requirements
- b) a qualitative and quantitative analysis of Housing complaint handling performance. This will also include a summary of the types of complaints we have refused to accept.
- c) any findings of non-compliance with the Complaint Handling Code by the Ombudsman.
- d) the service improvements we have made as a result of
- e) the learning from complaints
- f) any annual report about the landlord's performance from the Ombudsman

- g) any other relevant reports or publications produced by the Ombudsman in relation to the work of the council.

19.3 The annual complaints performance and service improvement report will be published on the complaints section of our website. This will be accompanied by a response from senior leadership team and the cabinet member with the portfolio for housing.

20. Scrutiny and oversight

Complaint performance will be monitored weekly, monthly, and quarterly, at operational and strategic levels. The complaints lead for housing will produce quarterly reports to the housing senior management team and Corporate Performance Board that monitors compliance, trends and learning outcomes.

20.1 The housing senior management team will receive:

- a) regular updates on the volume, categories and outcomes
- b) of complaints alongside complaint handling performance
- c) regular reviews of issues and trends arising from complaint handling
- d) regular updates on the outcomes of Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings
- e) the annual complaints performance and service improvement report.

20.2 The housing portfolio lead and the director of housing will receive:

- a) regular updates on the volume, categories, and outcomes of complaints alongside complaint handling performance
- b) regular reviews of issues and trends arising from complaint handling
- c) regular updates on the outcomes of Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings
- d) the annual complaints performance and service
- e) improvement report

20.3 The director for housing and the cabinet lead for housing will provide a response to the annual report, and this will be placed on the complaints area of our website along with the annual complaints performance and service improvement report.

21. Involvement of customers within our complaint handling approach

We welcome the involvement of customers in how we handle complaints and recognise this is an important way to help us improve services. We will:

- Report regularly to our formal customer involvement groups on our complaints performance
- Publish complaints performance in line with social housing regulation on our website every 3 months.
- Support customer scrutiny of our complaints service as part of our Resident Engagement strategy
- lessons learnt from complaints with customers on a regular basis

- Ask a random sample of customers for feedback once their complaint has been closed.

We will regularly review and evaluate its complaints procedure to ensure it is fair, transparent, and effective. We welcome feedback on the procedure and will use it to improve our services. Contact us at: Housing.customerservices@harrow.gov.uk

22. Business continuity

If we are ever unable to comply with the Housing Ombudsman Complaint Handling Code due to exceptional circumstances such as a cyber incident, we will place a notice on our website to advise residents who may be affected, with a timescale for returning to the code. We will inform the Housing Ombudsman Service of the incident and our recovery plan.

23. Communication and training

We will provide regular training sessions for all staff that is tailored to the needs of their role, this will ensure we have a positive culture towards complaints where we learn and improve our services.

We will have a standard objective in relation to complaint handling for all relevant staff that requires staff to co-operate across the department to resolve complaints, taking collective responsibility and act professionally.

We will publish our complaints policy and procedure, the Housing Ombudsman, and the complaint handling code on our website in a clear and accessible format for all residents.

We will have a regular feature in our resident newsletter, Homing In, on complaints. We will promote our complaints policy, the Housing Ombudsman, and the complaint handling code at least once a year.

24. Reasonable Adjustments

Under the Equality Act (2010) the council is required to ensure that the way we work does not place people with disabilities at a disadvantage when accessing services.

The council's approach to consideration and implementation of reasonable adjustments in relation to complaints includes:

- We will record details of any disabilities or vulnerabilities that a resident may disclose.
- Recording approved reasonable adjustment requests and keeping these under active review
- Providing opportunity for the complainant to have a representative deal with their complaint on their behalf, and to be represented or accompanied at complaints meetings where required.

25. Associated policies, guidance documents and regulatory framework

- Corporate Complaints Policy
- Home Loss & Disturbance Payment
- Compensation Procedure Insurance Policy
- Anti-social Behaviour Policy
- DV Policy
- Tenancy strategy and policy
- Aids and Adaptations policy
- Housing Allocation scheme
- Repairs Charter (currently under review)
- Tenant Involvement and Empowerment Standard