

Complaints performance & service improvement report for the housing landlord service

2024-25

DARTFORD
BOROUGH COUNCIL



Contents

No.	Section	Page
1	<u>INTRODUCTION</u>	3
2	<u>SUMMARY OF THE COMPLAINT HANDLING CODE SELF-ASSESSMENT FINDINGS</u>	4
3	<u>ANALYSIS OF COMPLAINT HANDLING PERFORMANCE</u>	5
4	<u>IMPROVEMENTS AS A RESULT OF LEARNING FROM COMPLAINTS</u>	7
	<u>ANNEX 1 – SELF-ASSESSMENT</u>	9

1. Introduction

- 1.1. Dartford Borough Council (“the Council”) strives to provide excellent services, recognising that it can always do better. Part of this involves exercising good practice in complaint handling by being open and responsive, listening to residents expressions of dissatisfaction and resolving issues as quickly as possible.
- 1.2. If a complaint is made, this follows a three-stage process. Stage 1 is where the resident expresses their dissatisfaction. If there is still dissatisfaction after stage 1, the resident may escalate the complaint to stage 2 for a review. This is the Council’s final response on the complaint.
- 1.3. For housing landlord related complaints, if the resident remains dissatisfied at the end of stage 2, the resident has the right to escalate the complaint to stage 3 for a Housing Ombudsman investigation. Residents also have a right to contact the Housing Ombudsman for advice before making a complaint to the Council or at any stage during the Council’s consideration of their complaint.
- 1.4. Achieving an accessible, positive and effective complaint handling culture includes learning from complaints and making improvements to services as a result. This document presents the Council’s housing landlord service annual complaints performance and service improvement report for the period 1 April 2024 to 31 March 2025 in accordance with the requirements set out in the Housing Ombudsman’s [Complaint Handling Code](#) (February 2024).
- 1.5. **About this report**
 - 1.5.1. The Housing Ombudsman’s Complaint Handling Code became statutory from 1 April 2024, which means that social housing landlords are now obliged by law to follow its requirements.
 - 1.5.2. The Social Housing (Regulation) Act 2023 places a legal duty on the Ombudsman to monitor social housing landlord’s compliance with the Code. This means there is a requirement on the Council, as a social housing landlord, to produce an annual complaints performance and service improvement report, which must include:
 - a) An annual self-assessment against the Code to ensure the complaint handling policy remains in line the Ombudsman’s requirements;
 - b) A qualitative and quantitative analysis of the social housing landlord service complaint handling performance. This must also include a summary of the types of complaints that the social housing landlord service has refused to accept;
 - c) Any findings of non-compliance with the Code by the Ombudsman;
 - d) The service improvement made as a result of learning from complaints; and
 - e) Any other relevant reports or publications produced by the Ombudsman in relation to the work of the social housing landlord.
 - 1.5.3. The annual complaints performance and service improvement report must be reported to the social housing landlord’s governing body (or equivalent) and published on the section of its website relating to complaints. The governing body’s response to the report must be published alongside this. Submission of this year’s self-assessment to the Ombudsman must be made by 30 September 2025.

2. Summary of the complaint handling code self-assessment findings

- 2.1. [Annex 1](#) sets out the full Complaint Handling Code self-assessment by the housing landlord service for 2024-25.
- 2.2. In summary, the self-assessment found areas of strong performance in compliance with the Code in relation to policy, procedure and exercising best practice. For example:
- Use of the universal definition of a complaint.
 - There are only two stages to the Council's complaints process (as stage 3 is a Housing Ombudsman investigation).
 - Timescales for accepting complaints, acknowledging complaints, and extensions align with the Complaint Handling Code.
 - Setting out the understanding of the complaint and the outcomes the resident is seeking ("the complaint definition") in the acknowledgement of the complaint.
 - Promotion of the complaints process and the role of the Housing Ombudsman.
 - Accessibility of the complaints process.
 - Scrutiny of complaints performance and learning from complaints by the Audit Board, Housing Advisory Board, Cabinet, Overview and Scrutiny Committee and a new Housing Complaints Panel chaired by the Member Responsible for Complaints.
 - Publishing of complaints performance and learning from complaints to residents to promote transparency.
- 2.3. The self-assessment also found some areas where, while the assessment has determined compliance, there is further opportunity for improvement, as set out below:

Improvement	Steps being taken
Continuous improvement of services through learning from complaints	Develop and carry out regular audits on complaints handled to identify efficiency and whether any service improvements should be made.
Increase satisfaction on complaint handling	Use tenant satisfaction measures survey and transactional complaints satisfaction survey insights to identify the pain points and actions for where to improve experience.
Recording reasons for refusing complaints	Develop a process within Infreemation for monitoring refused complaints to gain assurance that exclusions to the complaints process are being applied appropriately.
Monitoring actions taken from complaint outcomes	Develop a way of monitoring actions taken following a complaint to ensure learning and discussion of progress within the Housing Complaints Panel

3. Analysis of complaint handling performance

3.1. This report considers formal complaints made by residents (Council tenants and leaseholders) from 1 April 2024 to 31 March 2025.

3.2. Number of landlord related complaints opened

Stage 1	Stage 2	Total
81	16	97

3.3. Types of matters that were not accepted as a complaint

3.3.1. In practice, all complaints should be accepted unless the matter being raised is not covered under the corporate complaints procedure. Some examples include requests for a service, complaints about court proceedings, or complaints for which there is a right of appeal to a Tribunal.

3.3.2. We currently do not record reasons for why complaints have not been accepted, and will be taking this forward as an action for 2025-26 to improve our service.

3.4. Complaints by housing landlord service area

Repairs and maintenance	53
Anti-social behaviour	13
Estate management	12
Leasehold services	5
Moving to a property	6
Occupancy rights	1
Rents and service charges	5
Staff behaviour	8
Housing allocations	9
Right to buy	2
Complaint handling	0
Compensation	0
Total	114

Please note: In some instances, we may receive complaints that cover more than one service area, which is why the total figure may appear different to the figure of total number of complaints.

3.5. Stage 1 complaint outcomes

Upheld	Partially upheld	Not upheld	Withdrawn	Total
40	19	22	0	81

3.6. Stage 2 complaint outcomes

Upheld	Partially upheld	Not upheld	Withdrawn	Total
6	4	6	0	16

3.7. Stage 3 (Housing Ombudsman) complaint outcomes

3.7.1. The Housing Ombudsman publishes reports each year for social housing landlords with five or more findings determined. The Ombudsman may also produce special investigation reports following an investigation into whether there is a systematic failure within a landlord. During this reporting year, the Council's landlord service has not been subject to an Ombudsman report due to five or more determinations or a special investigation report. There has been one determination made by the Housing Ombudsman during this reporting year, as follows:

- Housing Ombudsman Complaint (202329960) – The Housing Ombudsman determined severe maladministration in the handling of the resident's reports of anti-social behaviour at the property; with complaint handling and record keeping.

3.7.2. There was one stage 3 complaint investigation that was investigated in the previous reporting year (2023-24) and determined in this reporting year:

- Housing Ombudsman Complaint (202301711) – The Housing Ombudsman determined there was a service failure in the handling of the resident's concerns about the conduct of Housing Service staff.

3.8. Tenant satisfaction measures

3.8.1. The housing landlord service collects, publishes and submits to the Regulator of Social Housing a set of annual tenant satisfaction measures relevant to housing stock that falls into the definition of Low Cost Rental Accommodation (LCRA)¹. These measures show how well the housing landlord service is doing in providing quality homes and services to its tenants (the measures do not include leaseholder residents in the calculations).

3.8.2. The following tenant satisfaction measures relate to the effective handling of complaints. The 2024-2025 results for these measures is set out below.

Management information measures	
CH01 (1) – Number of stage 1 complaints received per 1,000 homes	17.6
CH01 (2) – Number of stage 2 complaints received per 1,000 homes	3.8
CH02 (1) Proportion of stage 1 complaints responded to within the Housing Ombudsman's Complaint Handling Code timescales	85.1%
CH02 (2) – Proportion of stage 2 complaints handled within the Housing Ombudsman's Complaint Handling Code timescales	68.8%
Tenant perception survey measure	
TP09 – Proportion of respondents who report making a complaint in the last 12 months who are satisfied with their landlord's approach to complaints handling	35.9%

¹ LCRA is defined in the Housing and Regeneration Act 2008 as accommodation that is: (a) made available for rent, (b) has rent that is below the market rate, and (c) made available to people whose needs are not adequately served by the commercial housing market.

- 3.8.3. Performance in relation to handling complaints within Code timescales could be improved, where 85.1% of stage 1 complaints and 68.8% of stage 2 complaints were not handled within timescales. Stage 2 complaint handling within timescales has decreased from 2023-24 where 100% of complaints were handled within timescales. However, we have seen improvement compared to 2023-24 results where 65.0% of stage 1 complaints were handled within timescales. The timescales should be to respond to stage 1 complaints within 10 working days of sending an acknowledgement and 20 working days for stage 2 complaints. Where it becomes likely that the timescale will not be met, (for example, it is a complex complaint), the resident should be kept informed, and where there is a good reason, an extension agreed between both parties with a clear timeframe on when to expect a response in accordance to the Code extension timescales.
- 3.8.4. Performance in relation to satisfaction with complaint handling increased by +5% since last year where the tenant satisfaction measures survey carried out in 2023-2024 reported 30.9% of respondents were satisfied with approach to complaints handling compared to 35.9% this year. While the score is low, it is about average when benchmarked with other providers.
- 3.8.5. This year's survey found the most common themes mentioned in comments around improving complaints handling are listening to tenants more and better communication. This is similar to last year where communication, listening to tenants and ease of contacting were the most common themes mentioned.

4. Improvements as a result of learning from complaints

- 4.1. Improvements as a result of learning from complaints is an important element of a positive and effective complaint handling culture, which aims to ultimately increase resident satisfaction with complaint handling.
- 4.2. Learning from complaints is much more than scrutinising data, such as the level of complaints, decisions made and whether complaints were handled within timescales. Understanding where things have gone wrong, why they have gone wrong, and how to make sure the same thing does not happen again, is central to learning and improving services.

4.3. Improvements to complaint handling

- 4.3.1. Responses to complaints are taken in the form of an apology and putting things right. This reporting year the housing landlord service has learned from its complaints and from feedback received from its residents and the Housing Ombudsman. The following improvements have been made to how the Housing Service handles complaints:
- The Corporate Complaints Policy and Procedure has been updated to ensure it aligns with the Complaint Handling Code.
 - A Customer Communication and Engagement team was set up in the autumn of 2024. This included the recruitment of two Communication and Engagement roles, whose responsibilities include overseeing of the effective handling of complaints and learning from them.
 - A Housing Complaints Panel has been set up, chaired by the Member Responsible for Complaints, to scrutinise complaint handling performance, promote accountability and further drive forward a positive complaint handling culture.

- Best practice guidance on complaint handling has been issued to Housing Service staff to complement the Corporate Complaints Policy and Procedure and refresher complaints training delivered for Tenancy Services staff.
- Housing Managers received a presentation on complaint handling to ensure that the processes followed aligns with the updated Corporate Complaints Policy and Procedure and the principles of a positive complaint handling culture.
- Where complaints come directly into the Housing Service by phone or in person, a complaint logging template has been introduced to capture the details of the complaint. The aim is to ensure that such complaints are sent on to be recorded on the complaints system so that all complaints received, however they are made, are progressed appropriately and treated as formal complaints.
- New complaint letter templates have been introduced to ensure that residents receive the required information, as set out in the Complaint Handling Code.
- Customer satisfaction surveys are now sent out upon closure of complaints to provide learning opportunities.
- Complaints performance information is published to promote accountability and transparency.
- Information about how to complain and the process has been updated and improved on the website and in the 'How to Complain to Dartford Borough Council' leaflet to ensure the information aligns with the Corporate Complaints Policy and Procedure and Complaint Handling Code.
- A new corporate complaints management system (Infreemation) has been introduced with improved functionality on logging, tracking and record keeping on complaints.

4.4. Improvements to handling anti-social behaviour

4.4.1. Lessons learned from complaints have contributed towards improvements to how the housing landlord service handles anti-social behaviour, as follows:

- The One Housing system now includes a better way of recording and managing anti-social behaviour.
- An ASB app for residents to record anti-social behaviour incidents is now available.
- Vulnerabilities are now considered and risk assessments are carried out when any new anti-social behaviour case is received.
- Victims of anti-social behaviour are routinely updated on a monthly basis (or more frequently when necessary) via their preferred method of contact (phone or e-mail).
- Anti-social behaviour cases are reviewed on a monthly basis by both the Anti-Social Behaviour and Tenancy Management teams.
- A Case Management Panel has been introduced whereby the Tenancy Services Manager, Senior Housing Officers and all frontline Housing Officers come together to review cases relating to individual tenants (including their vulnerabilities and if concerns have been raised). If necessary, these are escalated to the Complex Case Panel which involves other professionals within the Housing Service and provides a route to request that Kent County Council Social Services prioritise action.

Annex 1 – self-assessment

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	Complaints Policy - Section 3, pages 10-11 Complaints webpage Housing complaints webpage	Dartford Borough Council's ("the Council's") Corporate Complaints Policy and Procedure ("the Complaints Policy") uses the Complaint Handling Code definition of a complaint. This is also clearly defined for residents on the Council's website.
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	Complaints Policy - Section 4.2, page 19-20 Complaints Policy - Section 2.5, page 5 Help and advice on the corporate complaints procedure webpage	The Complaints Policy states that a complainant does not have to use the word 'complaint' when expressing dissatisfaction. The Policy explains those who can use the complaints procedure as any person or organisation receiving or seeking to receive a service from the Council and someone acting on behalf of a person or organisation receiving or seeking a service from the Council e.g. Councillor, MP, next of kin. The 'help and advice on the corporate complaints procedure' webpage advises residents of organisations that may assist them in making a complaint.
1.4	Landlords must recognise the difference between a service	Yes	Complaints Policy - Section 4, pages 19-21	The Complaints Policy includes advice as to what constitutes a complaint, emphasising the importance of recognising the

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.			<p>difference between a formal complaint and a service request. The Policy explains that a first time request for a service or for information that is properly for the Council to give should not be seen as a complaint. A repeated request may well take the form of a complaint. A complaint should be raised when the customer raises dissatisfaction with the response to their service request.</p> <p>Where a service request is received via the complaints process, this is forwarded onto the relevant team to deal with. Service requests are recorded separately to complaints on the housing landlord service case management systems.</p>
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Complaints Policy - Section 3.1, page 11	The Complaints Policy states that delays, non-provision of services or finance, policy issues etc. should be included as a complaint. This includes failure to provide a service at the level or standard expected of the Council. Complaints are processed even if the handling of the service request remains ongoing.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made	Yes	Tenant Satisfaction Measures Survey Code of Practice on Resident Satisfaction Surveys	The Council's Housing Service uses transactional and perception survey feedback to measure satisfaction with the services provided. The Housing Service has developed an informative to be included in survey feedback forms and standard letter templates to explain how residents can make a complaint if they are dissatisfied with services received.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.			The Housing Service has a Code of Practice on Resident Satisfaction Surveys, which reinforces the need to ensure that where survey feedback raises a service request or a complaint, that this is passed onto the relevant team to address.

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	Complaints Policy Section 3.6, page 12	In practice, all complaints will be accepted unless the matter being raised is not covered under the Council's Complaints Policy (see 2.2). The Housing Service does not currently monitor the reasons for not accepting complaints. Moving forward, a process will be developed within Infreemation to monitor refused complaints (including service requests) to gain assurance that exclusions to the complaints process are being applied appropriately.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:	Yes	Complaints Policy - Section 3.6, page 12	In practice, all complaints will be accepted unless the matter being raised is not covered under the Council's Complaints Policy, including: <ul style="list-style-type: none"> • Requests for a service, for instance initial reporting of a faulty street light • Complaints about court proceedings • Complaints about personnel matters concerning employees of the Council

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<ul style="list-style-type: none"> The issue giving rise to the complaint occurred over twelve months ago. Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. Matters that have previously been considered under the complaints policy. 		Most commonly raised complaints that are not within the remit of our procedure webpage	<ul style="list-style-type: none"> Complaints about something which affects all or most of the inhabitants of the Borough for instance the amount of Council Tax being levied Complaints about matters for which there is a right of appeal to a Tribunal or to a Government Minister, for instance refusal of planning permission Complaints for which there is a legal remedy, for instance, an injury claim Complaints already being dealt with by the Local Government/Housing Ombudsman Complaints from employees of the Council (except as external users of services) Matters which have arisen more than twelve months before the complaint is made, unless there are very special circumstances Matters connected with 'internal malpractice' and the employment protection for individuals disclosing certain information in relation to the workplace (refer to the Whistleblowing Policy) Matters connected with the level of Housing Benefit/ Council Tax Benefit awarded Policy issues, e.g. the allocation of resources or prioritisation of works Systematic failure of the Council to discharge a function for which it is responsible. <p>The 'most commonly raised complaints that are not within the remit of our procedure' webpage provides clarification to customers on complaints that fall outside the remit of the Complaints Policy.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.3	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.	Yes	Complaints Policy - Section 3.6, page 12 and Section 3.11, pages 16-17	The Complaints Policy states that the Council will not investigate complaints more than twelve months after the cause of the complaint has arisen.
2.4	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 the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Complaints Policy Section 3.6, page 12 Exclusion Applied – Complaint not accepted letter template	All stage 1 complaints are accepted unless the matter being raised is not covered under the Complaints Policy (as covered in 2.2). The Policy states that when a decision is taken not to accept a Stage 1 complaint, an explanation will be provided to the customer setting out the reasons why the matter is not suitable for the complaints process and their right to take that decision to the relevant Ombudsman. A new letter template has been developed to ensure the required information is given.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes		While there are some exclusions to accepting a complaint under the Complaints Policy (as covered in 2.2), these are due to matters that do not come under the remit of the Policy, for example, there are alternative routes for redress such as through the courts or First-tier Tribunal. A blanket approach to excluding complaints is not taken. Each complaint is considered on its own merits on a case-by-case basis.

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	Equality & Diversity Document Framework Customer Access Review on the Complaints Procedure Housing landlord-related complaint methods used by residents 2024-25: <ul style="list-style-type: none"> • Online form – 50% • Paper form 0% • Email – 46.46% • Telephone – 2.36% • Via Ombudsman –1.18% 	<p>Complaints can be made using a range of options including in person, by phone (including Relay UK), by email/internet, on audiotape, in writing, in Braille and in languages other than English. In 2024-25, the majority of housing landlord related complaints were received online (50%) and by email (46.46%).</p> <p>The Council has a corporate Equality & Diversity Document Framework, which sets out how it will comply with the Public Sector Equality Duty under the Equality Act 2010. (Note: this framework is currently in the process of being reviewed and updated). The Complaints Policy has been subject to a Customer Access Review (last reviewed in December 2022), to assess the equality impact the procedure will have on the protected characteristic groups in terms of accessing and using the process, including and how reasonable adjustments are in place.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Housing Service complaint logging template	While the Council has an online and paper complaint form, complaints can be raised in any way and with any member of staff. Where complaints come directly into the Housing Service by phone or in person, a complaint logging template has been introduced in 2024 to capture the details of the complaint. The aim is to ensure that such complaints are sent on to the team responsible for logging complaints on the complaint management system. This is so that all complaints received, however they are made, are progressed appropriately and treated as formal complaints. In addition, best practice guidance on complaint handling has been issued to Housing Service staff to complement the Complaints Policy and raise awareness of the responsibility to take complaints directly.
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	<p>Number of housing landlord-related complaints opened (stages 1 to 3):</p> <ul style="list-style-type: none"> • 2021-22 – 43 • 2022-23 – 39 • 2023-24 – 30 • 2024-25 - 97 <p>Tenant Satisfaction Measures 2024-2025:</p> <ul style="list-style-type: none"> • CH01 (1) No. of stage 1 complaints received per 1,000 homes – 17.6 	Complaint volumes, types of complaints, complaint outcomes and learning from complaints, is monitored by the Housing Service. This shows that complaint volumes have increased since last year, which may be indicative of increased awareness raising of the complaints process and due to the introduction of a new complaint management system (Infreemation), which now records and manages complaints more effectively. The Housing Service will also be looking to benchmark on the Tenant Satisfaction Measures to understand how complaint volumes compare with other social housing providers of similar type and size of stock (CH01 number of stage 1 complaints received per 1,000 homes and number of stage 2 complaints received per 1,000 homes).

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			<ul style="list-style-type: none"> • CH01 (2) No. of stage 2 complaints received per 1,000 homes – 3.8 	
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	Corporate complaints webpage Complaints leaflet and form	<p>The complaints process is available in a clear and accessible format for all customers on the Council's website. This includes the following information:</p> <ul style="list-style-type: none"> • Formal complaints procedure and form • The stages of the complaints procedure and timeframes for responding • Help and advice on the complaints procedure
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	<p>Complaints Policy – Section 2.8, page 7, 8.2.1, page 34</p> Complaints leaflet and form Corporate complaints webpage Stages of the Corporate Complaints Procedure webpage Complaints relating to the Council's Housing	<p>The Complaints Policy includes how the process to complain will be publicised, including information about the Ombudsman and Code. This includes via the 'How to Complain to Dartford Borough Council' leaflet, which is available on the website, at Customer Services and other Council service outlets, and available to all staff who receive complaints.</p> <p>The Council publicises the Ombudsman services and the Code in various ways, such as on the 'Stages of the Corporate Complaints Procedure' webpage, the 'Complaints relating to the Council's Housing Landlord Functions' webpage, the 'Housing complaints' webpage and in the Housing Services' tenant and leaseholders newsletter 'the Link' articles.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			Landlord Functions webpage Housing complaints webpage The Link newsletters	
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	Complaints Policy – Section 2.5, page 5, 2.6, page 6 Help and advice on the corporate complaints procedure webpage	<p>The Complaints Policy explains that someone acting on behalf of a person or organisation receiving or seeking a service from the Council e.g. Councillor, MP, next of kin can use the complaints procedure on their behalf. It also recognises that some complainants will have special needs and it is important to be aware of this and the complainants needs, which can include the complainant wishing to enlist the help of a friend, relative, Councillor, MP, professional person, e.g. doctor or priest, or an advocacy service.</p> <p>The 'help and advice on the corporate complaints procedure' webpage advises residents of organisations that may assist them in making a complaint.</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	Stages of the corporate complaints procedure webpage Complaints relating to the Council's landlord functions webpage Housing complaints	<p>The 'stages of the corporate complaints procedure' and 'complaints relating to the Council's landlord functions' and 'Housing complaints' webpages include information on how customers can access the relevant Ombudsman.</p> <p>The Housing Services' tenant and leaseholder newsletter 'The Link' also contains a regular article on how to make a complaint and information about the right and how to access the Ombudsman.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			Link newsletter to tenants and leaseholders Stage 2 decision letter	The stage 2 decision letter templates includes information on how to escalate the matter to the relevant Ombudsman if the customer remains dissatisfied at the end of the Council's complaints process.

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	Complaints Policy – Sections 1.4 to 1.6, pages 2-3 Audit Board Complaints Monitoring and Procedure Review 2023-2024	<p>The Head of Legal Services is the Council's Corporate Complaints Officer and has overall responsibility for the Complaints Policy and its administration, maintenance and annual reporting to the Audit Board. The Corporate Complaints Officer remains independent of any decisions, but may give guidance and advice on procedure; and is the liaison with the relevant Ombudsman. The Council's Audit Board receives an annual report from the Corporate Complaints Officer on complaints activity for all complaints across the Council in the previous year, including landlord related complaints.</p> <p>Directors are responsible for the effective operation of the Complaints Policy within their areas of responsibility.</p> <p>In light of the increased expectations and standards on complaint handling, both from residents and the Housing Ombudsman, two new Communication and Engagement Officer roles have been created within the Council's housing landlord service to co-ordinate complaint handling. Their</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				responsibilities include the overseeing of the effective handling of complaints and learning from them. The officers are assigned to acknowledging complaints, ensuring that complaints are handled within timescales and quality checking the handling of complaints.
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 Corporate Complaints Officer and officers assigned to handling complaints have access to staff at all levels and autonomy to resolve complaints. The Corporate Complaints Officer is also available to all complaint handling officers to provide guidance and advice on procedure and best practice.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	<p>Complaints Policy – Section 2.13, page 10</p> <p>Guidance on the Corporate Complaints Procedure (July 2024)</p> <p>Housing Managers Training Presentation (October 2024)</p>	<p>The Complaints Policy sets out the level of training and support to be provided to complaints handlers. Guidance notes and training on best practice in complaints handling will be offered to all staff involved in dealing with complaints. Complaints handling will be included as a core module in the Customer Services training programme.</p> <p>Refresher courses will be run by the Corporate Complaints Officer. Directors, the Corporate Complaints Officer and DCOs will offer guidance and support. The whole ethos of the complaints system is to improve the Council's performance and perceptions of its performance; to learn from mistakes; and to build trust by being open and honest in handling complaints.</p> <p>Within the Council's Housing Service, best practice guidance on complaint handling was issued to staff in 2024 to</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				complement the Complaints Policy. Housing Managers received a presentation on complaint handling to ensure that the processes followed aligns with the updated Complaints Policy and the principles of a positive complaint handling culture. The Tenancy Services team has also received complaints update/refresher training.

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	Complaints Policy	The Council has a single policy for dealing with complaints covered by the Code. This means that customers are not treated differently when they complain about the standard of any type of service delivered by the Council.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Complaints Policy	The Complaints Policy does not have an extra named stage, such as 'stage 0' or an 'informal complaint' stage.
5.3	A process with more than two stages is not acceptable under	Yes	Complaints Policy – Section 8, pages 32-28	The Complaints Policy is a two-stage process for complaints handled by the Council. While the Complaints Policy has a 'stage 3' section, the stage 3 element is where the complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.			is investigated by an Ombudsman. Therefore, stage 2 is the Council's final response under the Policy and it does not prevent access to an Ombudsman past this stage.
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	Complaints Policy – Section 5.6, page 23-24 and 5.7, page 24	<p>Complaints handled by contractors form part of the two stage complaints process. The Complaints Policy states that the service Directorate/Department will be responsible for ensuring that specific contract clauses relating to complaints handling are incorporated in contracts. The service Directorate/Department is also responsible for monitoring its contractors' compliance with the Complaints Procedure.</p> <p>Complaints against contractors will be treated as complaints against the service area employing the contractors. Although complaints against contractors are categorised in the Complaints Policy as a 'special case', such complaints will normally be dealt with in accordance with the Complaints Policy and referred by the Directorate/ Departmental DCO to the contractor. The DCO will liaise with the contractor and agree how the matter will be handled, by whom, within what timescales etc. and will notify the complainant accordingly. In appropriate cases, the relevant Director may require the contractor to take certain interim measures to protect the interests of persons using its services.</p>
5.5	Landlords are responsible for ensuring that any third parties	Yes	Complaints Policy – Section 5.6, page 23-24 and 5.7, page 24	Complaints handled by contractors will normally be dealt with in accordance with the Complaints Policy which follows the Code requirements.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	handle complaints in line with the Code.			
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	<p>Complaints Policy – Section 8.1.1, pages 32-34, Section 8.1.2, pages 34-36</p> <p>Stage 1 and stage 2 acknowledgement letter templates</p>	<p>The Complaints Policy sets out the requirement to set out the complaint definition. Stage 1 and stage 2 acknowledgement letter templates have also been developed to ensure that complaint handlers include the complaint definition.</p> <p>If the basis of the complaint is not evident or clear enough, the service Manager will contact the complainant to clarify the focus of their complaint and then decide how the complaint should be taken forward. Options may include answering a question; providing further information; clarifying a misunderstanding; acknowledging and/or rectifying an error.</p>
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	<p>Complaints Policy – Section 5.7 and 5.9, pages 23-24</p> <p>Complaints Policy – Section 5.14, page 26-27.</p>	<p>The Housing Service is clear on which aspects of a complaint it is, or is not, responsible for. One of the expectations a resident can expect is that if the Housing Service cannot deal with an issue it is not responsible for, this is explained to the resident with information on how they can pursue the matter further elsewhere.</p> <p>The Complaints Policy provides clarification on areas not within the Council's remit, for example complaints about third parties and partner organisations.</p> <p>The Complaints Policy further clarifies examples of most commonly raised complaints not within the remit of the procedure, for example, complaints about Councillors,</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				highways, homelessness decisions, Housing Benefit/Council Tax decisions, liability for Council Tax or Business Rates, Parking Penalty Charge Notices, licensing decisions, refusal to grant planning permissions.
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> deal with complaints on their merits, act independently, and have an open mind; give the resident a fair chance to set out their position; take measures to address any actual or perceived conflict of interest; and consider all relevant information and evidence carefully. 	Yes		<p>All residents should expect from complaint handlers the following:</p> <ul style="list-style-type: none"> To objectively determine, based on the information and evidence provided, whether the facts of the case have been determined To listen to the voice of the resident That no complaint is investigated or responded to by a member of staff about whom the complaint has been made, or who has a conflict of interest in the matter. Officers, partners, Councillors and contractors must distance themselves from the investigation of or involvement in any complaint in which they are directly or indirectly implicated; That any request for the identity of the complainant to remain confidential will be respected as far as possible.
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	Complaints Policy – Section 2.7, page 6, Section 3.15, pages 17 - 18, Section 8.1.1, page 33 and Section 8.2.2, page 34	The Complaints Policy states that if it is not possible to provide the complainant with a full response within target timescales of 10 working days for stage 1 complaints or 20 working days for stage 2 complaints, the complainant must be kept informed of any extension.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints Policy – Section 9, pages 38-40	<p>The Complaints Policy notes the requirement on the Council to make reasonable adjustments. Complaints can be made using a range of options including in person, by phone (including Relay UK), by email/internet, on audiotape, in writing, in Braille and in languages other than English.</p> <p>Customers are asked to consider completing an equalities monitoring data form when they submit a complaint using the Corporate Complaints Form. However, the submission of the equalities data is voluntary/discretionary, and a significant number of customers choose not to provide this information. In addition, not all complaints are submitted via the Corporate Complaints Form and are received through other methods (i.e. email, telephone), and therefore, equalities monitoring data is not collected as routine.</p> <p>The housing landlord service does however record residents' disabilities and specific needs including any reasonable adjustments required, on the One Housing system as attributes.</p>
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 set out these reasons, and they must comply	Yes		In practice, all complaints will be accepted unless the matter being raised is not covered under the Council's Complaints Procedure (as covered in 2.2) or there is a valid reason not to accept the complaint.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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	Infreemation	All complaints and correspondence are logged on a new central corporate complaints management system (Infreemation), which was introduced in January 2025 to replace the previous system (Pentana). The system ensures that complaints records are fully maintained and preserved, and provides improved functionality so that efficiency is increased along with the ability to interrogate data more effectively and easily.
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 complaint can be remedied at any stage of the Complaints Procedure. It is the Housing Service aim to ensure that the remedy provided is appropriate and proportionate to redress the matter sufficiently without the need for escalation. Out of 81 stage 1 landlord related complaints in 2024-25, there were 16 complaints escalated by residents to stage 2.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents	Yes	Policy on Unreasonably Persistent and/or Vexatious Complainant's Behaviour	The Council has a Policy on Unreasonably Persistent and/or Vexatious Complainant's Behaviour. This includes reasons for putting any restrictions in place.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and 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	Policy on Unreasonably Persistent and/or Vexatious Complainant's Behaviour Employee Code of Conduct	<p>The Council's Policy on Unreasonably Persistent and/or Vexatious Complainant's Behaviour sets out that the Council must be mindful that it has responsibilities under equality and diversity legislation concerning the way it provides its services. Of equal importance, is the Employee Code of Conduct which requires staff to maintain high standards when dealing with customers. However, the need to be patient or make adjustments when providing our services does not extend to having to deal with unacceptable behaviour from customers. The Council must also be fair to all customers by prioritising its resources effectively. The time spent with each customer should be appropriate and proportionate.</p> <p>The Council is committed to providing services that are accessible to the broadest range of customers. This commitment also encompasses legal obligations under the Equality Act 2010. If a customer is having difficulty accessing services for any reason, the Council will adjust the way it provides its services where it is reasonable to do so. Where a customer is behaving in a difficult, persistent or unacceptable manner, the Council must consider whether this may be caused by any personal difficulties or</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				characteristics they have, which may be making services more difficult to access or use.

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	Complaints Policy – Section 8.1.1, pages 32-34	<p>The Complaints Policy states that under stage 1, resolution and apology should be immediate where possible. Residents most often want an explanation, an apology and reassurance that the same thing will not happen to others.</p> <p>If the basis of the complaint is not evident or clear enough, the service Manager will contact the complainant to clarify the focus of their complaint and then decide how the complaint should be taken forward. Options may include:</p> <ul style="list-style-type: none"> • answering a question; • providing further information; • clarifying a misunderstanding; • acknowledging and/or rectifying an error.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within 5</u>	Yes	Complaints Policy – Section 2.7, page 6, Section 3.13, page 17 and Section 8.1.1. page 32	The Complaints Policy sets out that stage 1 complaints must be acknowledged within 5 working days of receipt.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<u>working days of the complaint being received.</u>		Stage 1 acknowledgement letter template	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days of the complaint being acknowledged.</u>	Yes	<p>Complaints Policy – Section 2.7, page 6 and Section 8.1.1, page 32</p> <p>Stage 1 decision letter template</p> <p>Proportion of stage 1 complaints responded to within the Housing Ombudsman’s Complaint Handling Code timescales 2024-25 – 85.1%</p>	The Complaints Policy sets out that stage 1 complaints must be responded to within 10 working days of the complaint being acknowledged.
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 <u>10 working days</u> without good reason, and the reason(s) must be clearly explained to the resident.	Yes	<p>Complaints Policy – Section 2.7, page 6, Section 3.15, page 17-18, and Section 8.1.1, page 32-33</p> <p>Stage 1 extension to 10 working day response timescale letter template</p>	The Complaints Policy sets out that if it is not possible to provide the resident with a full response within the 10 working day timescale, the resident must be told whether an extension of up to 10 working days will be applied and when to expect a reply, and the reasons for the extension clearly explained. A stage 1 extension to the 10 working day response timescale letter template has been produced for using when an extension is applied.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints Policy – Section 2.7, page 6, Section 3.15, page 17-18, and Section 8.1.1, page 32-33 Stage 1 extension to 10 working day response timescale letter template	The Complaints Policy sets out that the resident must be provided with the contact details of the Ombudsman. The Ombudsman contact details are included in the stage 1 extension to the 10 working day response timescale letter template.
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	Complaints Policy – Section 8.1.1 – pages 32-33	The Complaints Policy states that if the complaint is upheld or partially upheld (i.e. the facts have been established), the complaint handler will consider whether any other actions and/or remedies are appropriate at the point of issuing the decisions on the complaint. The decision on the complaint is not postponed for the purpose of completing outstanding actions required for redress.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy,	Yes	Stage 1 decision letter template	The stage 1 decision letter template is structured so that each individual point of a complaint is set out followed by what was found in the investigation, and details of the reasons for the decision on that point by setting out the facts and conclusions.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	law and good practice where appropriate.			
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes		Additional complaints raised during the investigation that are related to the original complaint will be incorporated into the stage 1 response. If after the response to stage 1 is issued and the resident raises a further complaint regarding an issue unrelated to the first complaint, this is logged as a new complaint.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 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;	Yes	Stage 1 decision letter template	The stage 1 decision letter template includes the required information.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.			

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	Complaints Policy – Section 8.2.2, pages 34-37	The Complaints Policy has a stage 2 process for escalating the complaint should the complaint not be resolved to the residents' satisfaction after stage 1. Stage 2 is the Council's final response.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within 5 working days of the escalation request being received.	Yes	Complaints Policy – Section 8.1.2, page 34	The Complaints Policy sets out that stage 2 complaints must be acknowledged within 5 working days of receipt.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable	Yes	Complaints Policy – Section 8.1.2, pages 34-38	The Complaints Policy states that stage 2 is an opportunity to consider a case completely afresh through a formal investigation. The investigating officer will: <ul style="list-style-type: none"> • Make sure the complaint is clear

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	efforts to understand why a resident remains unhappy as part of its stage 2 response.			<ul style="list-style-type: none"> • Consider the complaint against any document submitted by the resident and/or associated with the complaint • Check the stage 1 process has been completed • Consider any new evidence • Review with the service Manager, the reasons for their stage 1 conclusion/decision in order to build a full picture as to how the decision was arrived at • Consider whether an interview with the resident is necessary • Consider the issues afresh for themselves • Consult Legal Services if there are any doubts about the Council's statutory powers relevant to the issues • Consider whether fast track action is required e.g. referral to another organisation/body or procedure for investigation • Decide upon their own findings in light of these considerations • Write to the resident setting out their findings
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints Policy – Section 8.1.2, page 34	The Complaints Policy states that the relevant Director will identify/nominate an investigating officer independent of the stage 1 decision. The person will normally be a representative from management other than the line manager e.g. the head of service or the relevant Director may choose to investigate personally.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days of the complaint being acknowledged.</u>	Yes	Complaints Policy – Section 2.7, page 6, Section 8.1.2, pages 34-35	The Complaints Policy sets out that stage 2 complaints must be responded to within 20 working days of the complaint being acknowledged.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			Proportion of stage 2 complaints responded to within the Housing Ombudsman's Complaint Handling Code timescales 2024-25 – 68.8%	
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 <u>20 working days</u> without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Complaints Policy – Section 8.1.2, pages 34-35 Stage 2 extension to 20 working day response timescale letter template	The Complaints Policy sets out that if it is not possible to provide the resident with a full response within the 20 working day timescale, the resident must be told whether an extension of up to 20 working days will be applied and when to expect a reply, and the reasons for the extension clearly explained. A stage 2 extension to the 20 working day response timescale letter template has been produced for using when an extension is applied.
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	Complaints Policy – Section 2.7, page 6, Section 3.15, page 17-18, and Section 8.1.2, page 34-35 Stage 2 extension to 20 working day response timescale letter template	The Complaints Policy sets out that the resident must be provided with the contact details of the Ombudsman. The Ombudsman contact details are included in the stage 2 extension to the 20 working day response timescale letter template.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints Policy – Section 8.1.2 – pages 34-38	The Complaints Policy states that if the complaint is upheld or partially upheld (i.e. the facts have been established), the complaint handler will consider whether any other actions and/or remedies are appropriate at the point of issuing the decisions on the complaint. The decision on the complaint is not postponed for the purpose of completing outstanding actions required for redress.
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	Stage 2 decision letter template	The stage 2 decision letter template is structured so that each individual point of a complaint is set out followed by what was found in the investigation, and details of the reasons for the decision on that point by setting out the facts and conclusions.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made;	Yes	Stage 2 decision letter template	The stage 2 decision letter template includes the required information.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes		Stage 2 is the Council's final response. The Complaints Procedure does not have a further stage for consideration by the Council.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	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: <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; 	Yes	Complaints Policy – Section 11, page 41	The Complaints Policy states that remedies for complainants under the procedure will normally take the form of putting things right and an apology. The options for redress are any, or a combination, of: <ul style="list-style-type: none"> • an apology where appropriate; • an explanation of the events or policy concerned; • agreeing to change a decision or action; • agreeing to put right a mistake or the consequences of a mistake; • a review of a policy or project, or its implementation, to take into account the complaint;

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<ul style="list-style-type: none"> • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 			<ul style="list-style-type: none"> • improving communication to staff or the public to avoid the same grounds for complaint as previously; • improving staff training to eliminate the root cause of the complaint. <p>Any remedies that will be taken are set out in the complaint decision letter.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaints Policy – Section 11, page 41	<p>The Complaints Policy recommends that complaint handlers refer to Local Government & Social Care Ombudsman and Housing Ombudsman guidance on remedies. Key questions in considering an appropriate remedy include:</p> <ul style="list-style-type: none"> • What outcome does the complainant want to achieve by complaining? • What has gone wrong? • What is the personal injustice? • Can action be taken to put the person affected back in the position they would have been in if nothing had gone wrong? • Is there an actual quantifiable financial loss, such as costs incurred or payments not received? • On what basis can loss of non-monetary benefit be calculated? • How severe was any other impact in terms of distress, harm or risk? • Did the actions or inactions of the complainant or a third party contribute to or lessen the injustice?

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				<ul style="list-style-type: none"> Is there a more appropriate form of payment than monetary? Overall, is the remedy proportionate, appropriate and reasonable?
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		<p>The decision letter will clearly set out any remedial actions. Such actions are logged on the complaints management system.</p> <p>The Housing Service will be taking steps to monitor actions that arise from complaints. These will be reviewed by the Housing Complaints Panel.</p>
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Complaints Policy – Section 11, page 41	The Complaints Policy recommends that complaint handlers refer to Local Government & Social Care Ombudsman and Housing Ombudsman guidance on remedies.

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: <ol style="list-style-type: none"> the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. 	Yes	Complaints Performance and Service Improvement Report for the Housing Landlord Service (2024-25)	The annual complaints performance and service improvement report for 2024-25 has been produced containing the required information.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.			
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing	Yes	Complaints relating to the Council's housing landlord function webpage	The 2024-25 annual complaints performance and service improvement report is being reported to the Council's governing body (Cabinet) on 22 May 2025. Then it will be published on the 'Complaints relating to the Council's housing landlord functions' page of the website alongside Cabinet's response.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	body's 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 applicable at this time.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		To date there has not been an instruction from the Housing Ombudsman to review and update the self-assessment.
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	<p>Cyber Security Strategy</p> <p>Cyber Incident Playbook</p> <p>Information Security Policy</p> <p>Business Continuity Plans</p> <p>Risk Registers</p>	The Council has various strategies, policies and plans in place for exceptional circumstances, including cyber incidents. The Council's Communications Team is responsible for providing information to residents who may be affected, such as through social media channels and the website. Where the housing landlord service is unable to comply with the Code due to exceptional circumstances, this will be communicated to residents and the Ombudsman.

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes		<p>Satisfaction with complaint handling increased by +5% since last year where the tenant satisfaction measures survey carried out in 2023-24 reported 30.9% of respondents were satisfied with approach to complaints handling compared to 35.9% this year. While the score is low, it is about average when benchmarked with other providers.</p> <p>Respondents to the survey were asked what the Housing Service could do to improve complaint handling. This year's survey found the most common themes mentioned in comments around improving complaints handling are listening to tenants more and better communication. This is similar to last year where communication, listening to tenants and ease of contacting were the most common themes mentioned.</p> <p>The Housing Service will be using tenant satisfaction measures survey and transactional complaints satisfaction survey insights to identify the pain points and actions for where to improve experience.</p>
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	Yes		<p>The Housing Service uses complaints as a source of intelligence and learning. A Housing Complaint Panel, chaired by the MRC, has been set up to scrutinise complaint handling performance and further drive forward a positive complaint handling culture (as covered in 9.7).</p> <p>To ensure continuous learning from complaint handling is practiced routinely, the Housing Service will be</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	positive changes in service delivery.			developing an audit tool to carry out regular audits on complaints handled to identify efficiency and whether any service improvements should be made.
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	Audit Board Report and meeting minutes Housing Advisory Board reports and meeting minutes Cabinet reports and meeting minutes Overview and Scrutiny Committee reports and meeting minutes Residents Annual Report Link newsletter to tenants and leaseholders	<p>The Council's Audit Board receives an annual report from the Corporate Complaints Officer on complaints activity for all complaints across the various Council services in the previous year, including landlord related complaints. The Audit Board committee reports are publically available on the Council's website.</p> <p>In terms of Housing Service complaints, performance and learning from complaints has been reported to the Council's Housing Advisory Board on a quarterly basis since October 2022. The Housing Advisory Board is made up of elected Members, senior Officers and representatives from the Dartford Tenant and Leaseholders' Forum. One of the main purposes of the group is to have oversight of, and act in an advisory role, in relation to the statutory housing governance requirements set out by the Regulator of Social Housing. This Board considers reports on proposed policy, strategy and performance in relation to housing issues and makes recommendations to the decision making body (Cabinet) as appropriate.</p> <p>Complaint handling performance by way of a quarterly Housing Service Update Report has been reported to the Council's governing body (Cabinet) since October 2024.</p>

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				<p>Complaint handling performance by way of an annual report has been reported to the Overview and Scrutiny Committee since January 2025.</p> <p>Complaints handling performance and learning from complaints is reported in the Residents Annual Report to tenants and leaseholders.</p> <p>Complaint handling performance and learning from complaints is also reported in the quarterly 'Link' newsletter to Council tenants and leaseholders.</p>
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		<p>The Head of Legal Services is the Council's Corporate Complaints Officer and has overall responsibility for the Complaints Procedure and its administration and maintenance. The Corporate Complaints Officer remains independent of any decisions, but may give guidance and advice on procedure.</p> <p>Directors are responsible for the effective operation of the Complaints Procedure within their areas of responsibility. Each Director will nominate a Senior Officer as a Directorate/ Departmental Complaints Officer (DCO), responsible for ensuring that complaints are dealt with in accordance with the Complaints Procedure.</p> <p>Directors are responsible for discussing with their managers, patterns of complaints and possible service improvements etc. with a view to remedying any acknowledged deficiencies as quickly as possible.</p>

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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		The Council's Member Responsible for Complaints (MRC) is the Council's Cabinet Portfolio Holder for Housing (also the chairman of the Housing Advisory Board – see 9.3).
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	Housing Service Update Report – Quarter 1 – 2024-25 Housing Service Update Report Quarter 2 – 2024-25	The MRC is supported by the Housing Service in their role to ensure the governing body (Cabinet) receive regular information and insight on complaints, and access to suitable information and staff. This is by way of a quarterly Housing Service Update Report which has been produced since October 2024.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;	Yes		<p>The MRC receives the required information at the quarterly Housing Advisory Board meeting and Cabinet meetings and this is recorded in the minutes (see 9.3 and 9.6).</p> <p>The MRC is consulted on the annual complaints performance and service improvement report which will be reported to the Housing Advisory Board to consider and comment on it before being reported to Cabinet.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.			To further enhance the role and involvement of the MRC in scrutiny and oversight of complaints, a Housing Complaint Panel, chaired by the MRC, has been set up to scrutinise complaint handling performance and further drive forward a positive complaint handling culture. Feedback from this panel will be fed into the quarterly Housing Service Update reports presented to the Housing Advisory Board, Cabinet and annually to the Overview and Scrutiny Committee.
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified	Yes	Complaints Policy – Section 2, pages 4-5	The Complaints Policy contains the objectives in relation to complaint handling for all relevant employees and third parties, which include to: <ul style="list-style-type: none"> • accept that things can go wrong but that the Council can put things right and learn from its mistakes; • provide residents with an effective way to complaint about Council services; • if possible, resolve complaints straight away; • deal with complaints fairly and consistently; • define the standards the public can expect when they make a complaint; • recognise the importance of complaints in providing feedback about Council services and performance;

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	<p>through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>			<ul style="list-style-type: none"> • set out how the Council will monitor complaints, and use that information to improve services and identify training needs; • ensure that residents are entitled to have the same access to the procedure, regardless of whether the service is being provided by the Council or a contractor.